

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 8/9/2010 5:17:08 PM  
**Subject:** VW/Audi Meeting with EPA

Hello Jim:

Per our telephone conversation, I am sending a request for a meeting with EPA staff on Thursday afternoon, August 19, 2010.

Preliminary discussion topics would be:

- Worst case emission and emission impact for OBD monitor
- HEV application for certification (example, open points)
- Worst case determination for FE (GHG) and emissions e.g. Start/Stop Switch
- Emission warranty part list for HEV parts and A/C system (GHG)
- Determination of OBD relevance
- Specific Hybrid test issues

I believe that we would need about 2 hours. I will try to refine the list of topics and provide better explanation.

Best regards,

Len

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Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 8/10/2010 12:49:33 PM  
**Subject:** Tentative: VW/Audi Meeting with EPA: Misc issues

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/11/2010 8:00:21 PM  
**Subject:** Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.

I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 8/12/2010 12:35:31 PM  
**Subject:** RE: Confirmatory cert test data on the 2011 Jetta  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

Thanks for the Jetta test results, we are evaluating it. Please send the Tiquan data to me when it becomes available because Bob Hart is out of the office today.

Just FYI, The Bentley is in route to Ann Arbor. Axel Reisner will be present when it arrives.

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, August 11, 2010 4:26 PM  
To: Hart, Robert (VWoA); Rodgers, William  
Subject: Confirmatory cert test data on the 2011 Jetta

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 8/13/2010 12:27:58 PM  
**Subject:** VW36100220 Release  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Can you please make arrangements to release the Jetta #VW36100220 so we can pick it up after we deliver the other Jetta (VW36100250) on Monday morning the 16th.

Thanks,

Bill Rodgers

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 8/13/2010 12:47:29 PM  
**Subject:** Diesel Shift Tables

Hello Jim,

According to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as indicated in the MY 2009 Application Common Sections (Section 12). These shift tables should already be in the EPA Lab database. They are the standard VW gasoline engine M6 shift tables.

Here are the upshift points by speed.

UP-SHIFT

1 - 2 15 mph

2 - 3 25 mph

3 - 4 40 mph

4 - 5 47 mph

5 - 6 52 mph

Due to the gear ratios in the diesel transmission the following declutch points must be used:

DECLUTCH

6 - 0 30 mph

5 - 0 25mph

4 - 0 20mph

I am still waiting for the US06 schedule.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Wednesday, August 11, 2010 4:00 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.

I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" [axel.reisner@volkswagen.de]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/18/2010 1:01:04 PM  
**Subject:** Retest Request for VW Tiguan - VW416 80218 cfg. 0

Hello Jim,

I informed Vince Mazaitis that Volkswagen has requested a retest of the FTP and HWFET for the VW Tiguan – VW416 80218 cfg. 0.

Both fuel economy values are more than 3% different from the manufacturer test results.

Best regards,

Bob Hart

Robert Hart

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 8/19/2010 4:36:38 PM  
**Subject:** VW Group: Retest Request for Volkswagen Test Vehicle VW36100250 cfg. 0

Hello Jim,

Volkswagen requests a retest for both the HWFET and US06 for test vehicle VW36100250 cfg. 0.

Volkswagen has accepted the test results for the FTP for that vehicle configuration.

Best regards,

Bob Hart

Robert Hart

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E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 8/23/2010 7:17:44 PM  
**Subject:** VW Group: Letter to Allow Porsche to Use VW Test Results  
CBI\_BVWX\_CORRES\_LETTER01\_R00.PDF

Hello Jim,

The attached letter has been submitted through the Verify System.

The letter grants permission for Porsche to use VW test results from the MY 2011 VW Touareg Hybrid in test group BVWXT03.0HEV for the emissions certification of the Porsche Cayenne Hybrid.

Best regards,

Bob Hart

Robert Hart

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# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager – Emiss. Cert. Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

August 23, 2010 Date

Subject: Carry Across of MY 2011 Volkswagen Emission Test Data to Porsche for  
Certification of Cayenne Hybrid

Dear Mr. Snyder,

The model year 2011 Volkswagen Touareg Hybrid and Porsche Cayenne Hybrid were developed together and share the same test vehicle. Porsche has permission from Volkswagen AG to carry across the Volkswagen manufacturer emissions tests and EPA confirmatory tests from the Touareg Hybrid for emissions certification of the Cayenne Hybrid.

VOLKSWAGEN GROUP OF AMERICA, INC.  
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AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/25/2010 7:56:28 PM  
**Subject:** VW Group: Test Type Question  
[image001.gif](#)  
[image002.gif](#)

Hello Jim,

The tests listed for the Touareg Hybrid (T.G.: BVWXT03.0HEV) in Verify are 1 FTP, 1 HWFE and 2 US06 (I'm guessing one 2-Bag and one 1-Bag w/PM). See highlighted info below.

The FTP is listed as type 21 which is a standard Federal fuel 2-day exhaust (w/can load).

Is this correct or will it be a UDDS? Is this just a limitation of the Verify System - maybe it hasn't been coded to indicate a UDDS test yet?

Bob Hart

Vehicle selected for Test VW526710023, Supplemental Information needed - Message

**From:**  
Verify Administrator

**Subject:**  
Vehicle selected for Test VW526710023, Supplemental Information needed

**Date:**  
Fri 8/13/2010 1:26 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: VWX Vehicle ID: VW526710023 Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 3 - HWFE 61 - Tier 2 Cert Gasoline 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Manufacturer Code: VWX

Vehicle ID: VW526710023

Vehicle Configuration #: 0

Test Group Name: BVWXT03.0HEV

Transaction Identifier: \_edc7f15d-c98b-40ac-9520-7f64fb8b3c88

Robert Hart

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**To:** axel.reisner@volkswagen.de[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 9/3/2010 11:07:16 AM  
**Subject:** Re: Vw test results pending  
[VW36100250\\_9-2-10.pdf](#)

Good morning Axel,

Please find enclosed the Laboratory test results for VW36100250. If you have any questions or concerns, please contact me.

Thanks Axel,

Best regards,

Vince Mazaitis

**From:** Jim Snyder/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>, Stephen Healy/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 09/02/2010 04:45 PM  
**Subject:** Re: Vw test results pending

Looks like the data is already in Verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>  
**Date:** 09/02/2010 04:38 PM  
**Subject:** Vw test results pending

Vince, I won't be in Friday. If the results on today's test of the VW Jetta VW36100250 are released,

please email them to Axel (email above) so he can determine whether to stay or head home.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



CERT

## NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-008

Vehicle ID: VW36100250

## Test Information



Test Date: 9/2/2010

Key Start: 13:16:19

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 89 us062bag (us06warmup\_2bagus06)

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: VOLKSWAGEN

MFR Codes: 590 VWX

Config #: 00

Transmission: AUTO

Shift Schedule: A09980041

Beginning Odometer: 003455.0 MI

Drive Schedule: us06warmup\_2bagus06

## Bag Data

## Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	6.218	340.639	0.168	0.826	3.387	
Ambient	2.360	0.000	0.011	0.042	1.898	
Net Concentration	4.010	340.639	0.157	0.787	1.611	2.168

Remarks:

## Phase 2

Sample	8.161	498.346	0.208	1.128	4.495	
Ambient	2.392	0.000	0.009	0.043	1.899	
Net Concentration	5.980	498.346	0.199	1.088	2.763	2.821

Remarks:

## Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.080	13.764	0.010	499.5	0.037	0.043 / 0.045	17.054
Phase 2	0.052	8.787	0.005	301.6	0.028	0.025 / 0.026	28.176
Composite	0.05842	9.88776	0.00632	345.356	0.02999	(NMOG=1.04xNMHC) 0.0288 / 0.0299	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #
Phase 1	17.04		D329 - FWD
Phase 2	28.15		Inertia: 3250
			EPA Set Co A: 5.22
			EPA Set Co B: 0.379
			EPA Set Co C: 0.01389
Composite	24.62		

Emissions Bench: Mexa 7200sie

v100414 - d329 EPAVDAEm100902122739

Page 1 of 2

Print Time 02-Sep-2010 13:40

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-008

Vehicle ID: VW36100250

## Results



	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.142	24.353	0.017	883.7	0.066	0.077	1.143
Phase 2	0.325	54.736	0.033	1878.7	0.174	0.153	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.99	28.99		
Avg Cell Temp (degF)	74.58	74.64		
Dew Point (degF)	51.52	51.53		
Specific Humidity (grains/lbm)	58.54	58.58		
NOx Corr Factor	0.9282	0.9283		
CO2 Dilution Factor	15.567	11.372		
CFV Vmix (scf @68F)	2168.38	3331.35		
CVS Flow Rate Avg (scfm)	548.96	547.62		

Fan Placement: US06 Only - One Large Fan - Down - Front

Phase Time (secs)	130.01	364.99	107.00
Distance (miles)	1.769	6.229	
Bag Analysis Time (secs)	110.2	322.1	

## MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0297	2.24	0.0067	296	0	0.0208

Odometer  
3305 M

MPG  
29.7

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 20.61 % higher than EPA MPG

Dyno: 21


Fuel: 61 Tier 2 Cert Gasoline

*Read back ABC, reinspect, tailpipe BP OK DV 9-2-10*  
I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

CERO

NVFEL Laboratory Test Data								CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2010-0225-009				Vehicle ID: VW36100250				
		Test Date: 9/2/2010		MFR Name: VOLKSWAGEN				
		Key Start: 12:03:18		MFR Codes: 590		VWX		
		Fuel Container ID: F00023		Config #: 00				
		Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO				
		Test Procedure: 03 HWFET (hwfelprep_hwfet)		Shift Schedule: A09980011				
		Calculation Method: Gasoline		Beginning Odometer: 003434.0 MI				
Pretest Remarks:		Drive Schedule: hwfet_hwfet						
<b>Bag Data</b>		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample		3.416	6.733	0.059	1.073	2.376		
Ambient		2.453	0.000	0.013	0.044	1.922		
Net Concentration		1.159	6.733	0.047	1.032	0.608	0.464	
Remarks:								
<b>Phase 2</b>								
Sample								
Ambient								
Net Concentration								
Remarks:								
<b>Phase 3</b>								
Sample								
Ambient								
Net Concentration								
Remarks:								
<b>Phase 4</b>								
Sample								
Ambient								
Net Concentration								
Remarks:								
<b>Results</b>		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1		0.008	0.089	0.001	215.4	0.005	0.003 / 0.003	41.253
		(NMOG=1.04xNMHC)						
<b>Fuel Economy</b>		<u>Gasoline MPG</u>	<u>Dyno Settings</u>					<u>Dyno #:</u> D329 - FWD
Phase 1		41.21						Inertia: 3250
								EPA Set Co A: 5.22
								EPA Set Co B: 0.379
								EPA Set Co C: 0.01389
								Emissions Bench: Mexa 7200sle
v100414 - d329		EPAVDAEm100902113910		Page 1 of 2		Print Time 02-Sep-2010 12:26		

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-009

Vehicle ID: VW36100250

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.078	0.914	0.010	2203.2	0.047	0.031	1.143

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.99			
Avg Cell Temp (degF)	74.81			
Dew Point (degF)	51.24			
Specific Humidity (grains/lbm)	57.93			
NOx Corr Factor	0.9257			
CO2 Dilution Factor	12.481			
CFV Vmix (scf @68F)	4118.72			

CVS Flow Rate Avg (scfm) 323.00

Fan Placement: One Fan - Down - Front

Phase Time (secs)	765.10
Distance (miles)	10.230
Bag Analysis Time (secs)	105.2

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0112	0.11	0	221	0	0.0073

<u>Odometer</u>	<u>MPG</u>	<u>PM</u>
3175 M	40.1	0.018

MPG is -2.70 % lower than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21  
Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

9-2-10

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 9/21/2010 3:50:44 PM  
**Subject:** VW Group: MY 2011 VW Touareg Hybrid

Hello Jim,

I uploaded a revised MY 2011 VW Group Common Sections today. You should now be able to find the Evap Family description.

The pages that were updated are listed on Section 15VW Page 1.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

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**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; Ian.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; erry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; erry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/7/2010 4:09:41 PM  
**Subject:** EPA CAFE letter & calculation attached - 2009 Volkswagen IP, LT  
[2009-0590-LT-CAFE-V127.pdf](#)  
[2009-0590-IP-CAFE-V127.pdf](#)

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

CONFIDENTIALITY: The cover letter and the summary information on the "CAFE report" page are not confidential. However, the information included in the calculation section of the attached PDF file contain sales information in more detail than is normally available to competitors and to the general public. Release of the calculation section of this PDF file is not authorized.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/14/2010 10:48:25 AM  
**Subject:** Bentley 15113  
[15113\\_10-13-10.pdf](#)


Good morning Bob,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

C150

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Information			Test Date: 10/13/2010				
Test Number: 2010-0276-005			Vehicle ID: 15113				
	Key Start / Hot Soak: 10:57:27 / 09:37		MFR Name: BENTLEY MOTORS LTD.				
	Fuel Container ID: F00023		MFR Codes: 165 BEX				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Config #: 00				
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)		Transmission: AUTO				
	Calculation Method: Gasoline		Shift Schedule: A09980005				
	Pretest Remarks:		Beginning Odometer: 005298.0 MI				
			Drive Schedule: ftp3bag				
			Soak Period: 20.6 hours				
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>							
Sample		13.448	81.656	1.107	1.314	3.708	
Ambient		3.591	0.000	0.033	0.046	1.966	
Net Concentration		10.211	81.656	1.077	1.273	1.935	7.865
Remarks:							
<b>Phase 2</b>							
Sample		3.575	1.402	0.043	0.942	1.838	
Ambient		3.634	0.000	0.025	0.046	1.940	
Net Concentration		0.197	1.402	0.020	0.899	0.034	0.155
Remarks:							
<b>Phase 3</b>							
Sample		4.573	4.199	0.179	1.133	1.956	
Ambient		4.628	0.000	0.027	0.046	2.011	
Net Concentration		0.337	4.199	0.154	1.091	0.115	0.197
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.185	2.989	0.058	732.1	0.041	0.143 / 0.148
Phase 2		0.006	0.081	0.002	821.1	0.001	0.004 / 0.005
Phase 3		0.006	0.152	0.008	619.7	0.002	0.004 / 0.004
Weighted		0.04301	0.70427	0.01516	747.222	0.00967	(NMOG=1.04xNMHC) 0.0329 / 0.0342
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>	<u>Dyno Settings</u>				
Phase 1		12.05	Dyno #: D005				
Phase 2		10.82	Inertia: 6000				
Phase 3		14.33	EPA Set Co A: 10.32				
			EPA Set Co B: 0.2173				
			EPA Set Co C: 0.02181				
Weighted		11.87	Emiss-Bench: D005				





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 1/8/2009 7:40:49 PM  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hi Jim:

I will have to get back to you on the number of people. Not everyone is back to work yet in Germany so it will likely be the beginning of next week. If you have to act quickly to reserve a room, I would guess at about 5 people in our group and 1 pm to 4 pm on Thursday and 9 am to noon on Friday.

Thanks and best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Thursday, January 08, 2009 2:24 PM  
**To:** Ex. 7  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Forgot to ask, do you know what time you will show up on Thursday and Friday? So I can book a room. And roughly how many people?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**Ex. 7**

01/08/2009 02:11 PM  
To Jim Snyder/AA/USEPA/US@EPA

cc Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA,  
David Good/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
Subject RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hello Jim:

I have heard back from my colleagues regarding the timing of a meeting to discuss topics related to the certification and testing of hybrid vehicles. The proposal is the end of the week of March 2, 2009. More specifically, the afternoon of March 5 and the morning of March 6. I am not sure how you would feel about dividing the meeting over two days, particularly since the second day is a Friday. I realize that some of the staff may not be in on Friday.

Please let me know if this timeframe is workable.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, December 11, 2008 4:30 PM

To: **Ex. 7**

Subject: Re: Fw: Hybrid Vehicle Meeting in Early 2009

**Ex. 7** We are certainly interested in having a meeting with them. It will be with me, Linc, Steve Healy, Chris Nevers, Dave Good and possibly Arvon Micham. I don't think we have any particular timing constraints yet.

Are they planning to visit the U.S. a particular week? Let me know and I will fit a meeting time into our schedules.

Jim Snyder  
Light-Duty Vehicle Group

Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

Linc Wehrly/AA/USEPA/US

12/09/2008 08:07 AM

To Jim Snyder/AA/USEPA/US@EPA  
cc Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Subject Fw: Hybrid Vehicle Meeting in Early 2009

Jim,

Please be sure to invite Steve and Chris to this meeting.

Thanks,  
Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 12/09/2008 08:06 AM -----

**Ex. 7**

Received Date:

12/08/2008 04:55 PM

Transmission Date:

12/08/2008 04:55:42 PM

To Linc Wehrly/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Jim  
Snyder/AA/USEPA/US@EPA,

**Ex. 7**

cc

Subject Hybrid Vehicle Meeting in Early 2009

To all:

My colleagues in at our parent company in Germany have expressed an interest in meeting with the certification staff at EPA and ARB to discuss issues related to hybrid vehicle technology and certification. The following is a general list of the topics of interest:

- HEV Concepts/Technology
- Certification, Durability, Emissions Measurement
- Test Procedures
- Pressurized Fuel Tank
- Bench Testing
- Other

We would like to use the opportunity to share our thoughts on these topics and discuss the intent and direction of the agencies. At this time I would like to suggest meeting with each agency separately, in the mid-February to early-March time frame. My questions are 1.) whether the agencies are agreeable to such a meeting, 2.) who you would recommend participate from the agencies, and 3.) if there any particular time constraints during the suggested period.

I appreciate your consideration of this suggestion and look forward to hearing from you.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Bruce Sdunek/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 2/12/2009 1:19:43 PM  
**Subject:** MY 2002 Bentley (Rolls Royce Test Group) Field Fix  
CBI\_2RRXV06.7TTC\_APP\_F02\_R00.PDF

Ex. 7

Hello Bruce and Jim,

I'm sending this to both of you since there hasn't been a formal announcement as to who is our EPA cert engineer.

The attachment contains a field fix for MY 2002 Bentley models in Rolls Royce test group 2RRXV06.7TTC. I would submit it through our Rolls Royce Verify account, but the Verify system only goes back to MY 2003 which makes that account useless. We did not have any Roll Royce test groups in MY 2003.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager – Emis. Cert. Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

February 10, 2009 Date

Subject: Field Fix for 2002 Model Year Bentley Light Duty Vehicles  
-Test Group 2RRXV06.7TTC and Evaporative Family  
2RRXR0200E96

VOLKSWAGEN GROUP OF AMERICA, INC  
3800 HAMILIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Dear Mr. Good,

Volkswagen of America Inc. ("VWoA") is the sole importer and distributor of Bentley motor cars in the United States, and submits this document on behalf of Bentley Motors Limited ("BML"), the manufacturer.

With this letter we wish to inform the agency of a field fix for the following test group.

Test Group	2RRXV06.7TTC
Evaporative Family	2RRXR0200E96
Models	Bentley Arnage, Bentley Arnage LWB
Transmission	A4

The enclosed page describes Field Fix FF\_2B6.7TTC\_02\_09, which is an update to the Engine Control Module (ECM) calibration to prevent the limp home mode activation under certain cruise control circumstances. Details of the issue, analysis and resolution are described in the enclosure.

Also shown in the enclosure are the new Calibration Identification (CAL ID) and Calibration Verification Numbers (CVN) that will be used for the field fix on 2002 MY vehicles.

If you have any questions with regard to this information please contact our office in Auburn Hills at (248) 754-4215 or (248) 754-4224.

Sincerely,

A handwritten signature in black ink, appearing to read "LW Kata", with a stylized flourish at the end.

Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)



## **Field Fix MY 2002**

**Subject :** Test Group: 2RRXV06.7TTC  
Models: Bentley Arnage  
Bentley Arnage LWB  
Transmission: A4

**RC / FF Nr.:** FF\_2B6.7TTC\_02\_09

**Event:** Limp home mode activation during cruise control operation -  
Diagnostic Trouble Code (DTC) P0606 is set as a part of  
electronic throttle diagnosis.

**Analysis:** When the vehicle is operated in cruise control mode, under  
certain circumstances the actual torque exceeds the  
permissible torque. This leads to limp home mode becoming  
active and fault code P0606 is logged.

**Activities:** The update to ECM calibration is to be used as necessary as a  
field fix for the small number of 2002 MY vehicles that may  
experience the above problem.

<b>Model</b>	<b>Calibration Identification number (CAL ID)</b>	<b>Calibration Verification Number (CVN)</b>
Bentley Arnage	PB106106PV	DEC7A15C
	PB110307PN	6A5BAA03
	PB110307PS	E1F1A999
	PB106107PQ	547B8213
Bentley Arnage LWB	PB106107PQ	547B8213

**Impact on  
Emissions:** This change does not cause an impact on emissions.

**Test Data:** Not applicable.

## Running Change/Field Fix Log

Model Year: 2002  
Test Group: 2RRXV06.7TTC  
Evaporative Family: 2RRXR0200E96

Running Change / Field Fix Number	Description of Change / Reason	Date
FF_2B6.7TTC_01_08	Revised ECM calibration to resolve possible false detection of a very small leak P0456.	June 23, 2008
FF_2B6.7TTC_02_09	Revised ECM calibration to resolve cruise control concern.	February 03, 2009

### Prefixes:

RC = Running Change  
FF = Field Fix  
RF = RC/FF

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 3/4/2009 11:23:26 PM  
**Subject:** RE: Volkswagen/Audi

Hi Jim:

Actually, I planned to do both. We just wrapped up our planning session here and I intend to send an electronic version. I still have to downsize it a bit, so it may be a little later tonight. I also plan to bring paper copies that you can use for note-taking.

Thanks for asking Karl to join.

See you tomorrow.

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

-----Original Message-----

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

**Sent:** Wednesday, March 04, 2009 5:51 PM

**To:** Ex. 7

**Subject:** Re: Volkswagen/Audi

Ex. 7 are planning to bring copies of the presentation or can you send it to us ahead of time? It would be nice to have handouts to look at and take notes on during the presentation.

I also invited Karl Paulina from the lab. He'll be interested in the parts about HEV testing .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division United States  
Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**Ex. 7**

To

Jim Snyder/AA/USEPA/US@EPA, Chris  
03/04/2009 02:39 PM Nevers/AA/USEPA/US@EPA, David  
Good/AA/USEPA/US@EPA, Linc  
Wehrly/AA/USEPA/US@EPA, Stephen  
Healy/AA/USEPA/US@EPA, Arvon  
Mitcham/AA/USEPA/US@EPA, Ted  
Trimble/AA/USEPA/US@EPA

cc

**Ex. 7**

Subject

Volkswagen/Audi

To all:

A few days ago I distributed a draft agenda for our meetings scheduled for Thursday (5.MAR) and Friday (6.MAR) of this week. We have finalized the agenda and I am now providing the final version. The agenda includes a discussion of durability procedures and OBD, so I have added Arvon Mitcham and Ted Trimble to the distribution. They were not on the EPA meeting invitation, but I hope that they are able to participate.

We will be forwarding some material shortly, that presents a preview of the upcoming Volkswagen and Audi hybrid technology, for your reference.

We will try our best to cover the bulk of this material on Thursday afternoon.

Best regards,

**Ex. 7**

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

[attachment "Agenda EPA Cert\_Final.ppt" deleted by Jim  
Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; ed Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; arl Paulina/AA/USEPA/US@EPA[]

**Cc:** Ex. 7

**Ex. 7**

**From:** Ex. 7

**Sent:** Thur 3/5/2009 3:34:08 AM

**Subject:** Volkswagen/Audi Presentation - 1 of 2

1 of 2

To all:

Attached are copies of the graphics that we intend to present during our meetings. There may be some slight variation in the order of presentation for the major topics.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

This Email message contained an attachment named  
EPA presentation\_sent\_final.zip  
which may be a computer program. This attached computer program could  
contain a computer virus which could cause harm to EPA's computers,  
network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced  
into the EPA network. EPA is deleting all computer program attachments  
sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you  
should contact the sender and request that they rename the file name  
extension and resend the Email with the renamed attachment. After  
receiving the revised Email, containing the renamed attachment, you can  
rename the file extension to its correct name.

For further information, please contact the EPA Call Center at  
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 Chris Nevers/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 [redacted] Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 [redacted] Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7 [redacted] Carl Paulina/AA/USEPA/US@EPA; [redacted] Ex. 7

**Ex. 7**

**From:** [redacted] Ex. 7  
**Sent:** Thur 3/5/2009 1:21:41 PM  
**Subject:** Volkswagen Audi Presentation

Hi Dave:

As we just discussed, I have received a number of "undeliverable" messages from my transmission of the VW/Audi presentations last night. It appears that the file size is too large (even in pdf and zipped). I do not believe that renaming this file will solve the problem, so I am sending the presentations in a number of segments. I will include "1 of X" in the subject to preserve the order. As mentioned, I will also bring a number of printed copies.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**



**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA;Ted Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; ed Trimble/AA/USEPA/US@EPA;Carl Paulina/AA/USEPA/US@EPA[]; arl Paulina/AA/USEPA/US@EPA[]

**Cc:** Ex. 7

**Ex. 7**

**From:** Ex. 7

**Sent:** Thur 3/5/2009 2:17:14 PM

**Subject:** VW/Audi Presentation March 5/6, 2009 ... 5 of 5

Bench Aging Procedure USA.pdf

PART 5 of 5

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kolesa, Konrad, Dr. (I/EA-52)" [Konrad.Kolesa@AUDI.DE]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Thomas, Richard"  
**Sent:** Thur 4/2/2009 7:10:53 PM  
**Subject:** Volkswagen group Electronic Fund Transfer Log  
[20090402150346138.pdf](#)

Hello Jim;

Here is the print out from our Volkswagen Accounts Payable group in Ajax, Canada where it shows that the transfer will take place tomorrow April 3, 2009. It lists each of the test groups which the payment covers. I mailed the Certification Fee Filing Form to Lt. Louis for the first five test groups on March 19, 2009 and the last ten test groups on April 1, 2009. That was April fools day so I hope it makes it. If anyone has any questions they may contact me directly.

Thanks and best regards,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Willem VandenBroek/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard"  
**Sent:** Fri 4/3/2009 3:18:51 PM  
**Subject:** RE: Cert Fee Issues #351 and 352  
[20090402150346138.pdf](#)

Hello Bill;

I sent the attached e-mail to Jim Snyder yesterday, I hope he sent it to you before he left. I know he is not in the office today. Bottom line, all Volkswagen Group brands, Volkswagen, Audi, Bentley, Lamborghini and Bugatti are paid from our Volkswagen finance department electronically. The fee filing forms for all 15 test groups covered with today's payment were mailed to St. Louis on two separate dates, March 19 and April 1, 2009. If there are any further questions, please feel free to contact me directly.

Best regards,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

-----Original Message-----

From: VandenBroek.Willem@epamail.epa.gov  
[mailto:VandenBroek.Willem@epamail.epa.gov]  
Sent: Friday, April 03, 2009 10:38 AM  
To: Thomas, Richard  
Subject: Fw: Cert Fee Issues #351 and 352

Richard:

Following up on our conversation, I will process this as indicated below unless you say otherwise. Note that the audi can't be listed as paid until the fees process has received the fee filing form.

Bill

----- Forwarded by Willem VandenBroek/AA/USEPA/US on 04/03/2009 10:37 AM -----

"Ventre, Adam  
M."

<adamventre@PQA. To  
com> Willem  
Sent by: VandenBroek/AA/USEPA/US@EPA  
"Ventre, Adam cc  
M." "Burke, Chaffee"  
<adamventre@PQA. <chaffeeburke@pqa.com>  
com> Subject  
Cert Fee Issues #351 and 352  
Received Date:  
04/03/2009 10:17  
AM  
Transmission  
Date:  
04/03/2009  
10:17:50 AM

Bill-

We received an ACH payment for \$514,845 via Cashlink today. This is a Volkswagen payment that lists an Audi engine family names (AADXJ03.23UC) under Payment Related Information. We have not yet received FFF's for the Audi engine indicated on the payment. However, it appears that this payment could potentially resolve Cert Fee Issues #351 and #352 (Engine families: AVWXV02.5259, AVWXV02.5257, AVWXV02.5253, AVWXV02.5U35, and AADXV05.2LR8). Resolving these issues would account for \$171,615 of the payment. The remaining \$343,230 would be listed as a Payment no FFF issue. Please let us know if you would like us to handle this differently.

Thanks!

Adam Ventre  
Perrin Quarles Associates, Inc.  
(434) 979-3700 x 176

Subject: Volkswagen group Electronic Fund Transfer Log  
Date: Thu, 2 Apr 2009 15:10:53 -0400  
Message-ID: <A8A2B485FAC02340A4BF5F5129D1FE5113656A38@VWOOAHSH001.vwoa.na.vwg>  
From: "Thomas, Richard" <Richard.Thomas@vw.com>  
To: <snyder.jim@epa.gov>  
Cc: "Kolesa, Konrad, Dr. (I/EA-52)" <Konrad.Kolesa@AUDI.DE>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Content-Type: multipart/mixed; boundary="----=\_NextPart\_002\_01C9B3C6.BE14813F"  
X-MimeOLE: Produced By Microsoft Exchange V6.5  
Content-class: urn:content-classes:message  
MIME-Version: 1.0  
X-MS-Has-Attach: yes  
X-MS-TNEF-Correlator:

Thread-Topic: Volkswagen group Electronic Fund Transfer Log  
Thread-Index: AcmxzZePN09/dhDKTT+7EN0qq8fwXwAABNVA

Hello Jim;

Here is the print out from our Volkswagen Accounts Payable group in Ajax, Canada where it shows that the transfer will take place tomorrow April 3, 2009. It lists each of the test groups which the payment covers. I mailed the Certification Fee Filing Form to Lt. Louis for the first five test groups on March 19, 2009 and the last ten test groups on April 1, 2009. That was April fools day so I hope it makes it. If anyone has any questions they may contact me directly.

Thanks and best regards,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Linc Wehrly/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** **Ex. 7**  
**Sent:** Fri 4/10/2009 1:34:08 PM  
**Subject:** Hybrid Warranty and Maintenance

To all:

FYI.

As a follow-up to our 2-day meeting last month regarding future HEV certification, I have submitted a document, through the VERIFY system, requesting review of the VW proposed HEV warranty coverage and maintenance intervals.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;Tom Ball/AA/USEPA/US@EPA;Ross Ruske/DC/USEPA/US@EPA[]; om Ball/AA/USEPA/US@EPA;Ross Ruske/DC/USEPA/US@EPA[]; oss Ruske/DC/USEPA/US@EPA[]  
**From:** "Hennard, Mike"  
**Sent:** Thur 4/16/2009 12:51:54 PM  
**Subject:** RE: VW 2586 Recall Report - What 2003 models are covered?

Hello David:

I researched your question and found the following details regarding test group 3VWXV02.0223:

The Volkswagen Warranty Extension for catalytic converters does indeed cover all model vehicles in this 3VWXV02.0223 test group. The vehicles are divided into two distinct engine types, "AHV" for models Golf, Jetta, New Beetle (sedan) and engine type "BDC" which distinctly for the New Beetle Convertible.

I checked the VW Service Circular and the VW dealers were given this correct information. The VERR report submitted to EPA on November 09, 2007 only included the New Beetle Convertible as you stated. I will have the VERR corrected and re-submit VERR report to you immediately to assure EPA records are correct.

Thanks for finding this discrepancy.

Mike Hennard  
VWGoA - EEO

-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Wednesday, April 15, 2009 5:27 PM  
To: Hennard, Mike  
Cc: Snyder.Jim@epamail.epa.gov; Ball.Tom@epamail.epa.gov;  
Ruske.Ross@epamail.epa.gov  
Subject: Re: VW 2586 Recall Report - What 2003 models are covered?

Mike,

The 2003 certificate for test group 3VWXV02.0223 covers Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models. The certif was originally issued 4/25/02 and revised on 9/5/02, adding New Beetle Convertible models.

Do you know why the attached voluntary recall/ warranty extension to 100K only applies to 2003 New Beetle Convertible models? It looks like a typo and it should actually cover 2003 Golf, Jetta, Jetta Wagon, New Beetle and New Beetle Convertible models.

Please advise.

Thanks

VW 2586 Recall Report

Michael Stephens

to:

David Good, Ross Ruske

04/15/2009 04:33 PM

Dave,  
Attached is the scanned file of the VW Catalytic Converter extended warranty Recall Report. It clearly shows that for 2003 it included only the New Beetle Convertible and not the Jetta.

(See attached file: Volkswagen 2586 Recall Report.pdf)

Sincerely,  
Michael Stephens  
EG&G Technical Services, Inc.  
E-mail: stephens.michael@epa.gov  
Phone: 734-214-4879  
Fax: 734-214-4676



To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: Ex. 7  
From: Ex. 7  
Sent: Fri 4/24/2009 12:48:29 PM  
Subject: FW: Pending Fees for Volkswagen Group Test Groups

Hello Jim;

Thanks for the call, I must have just left the office when you called.  
As you can see from the following information I am still waiting for the ten fee filing forms to catch up to the \$343,230 moneys we transferred on April 3, 2009. Bill has now gotten the forms I sent him and I am waiting for a response. If you discover anything, please let me know.

Thanks,

Ex. 7

-----Original Message-----

From: VandenBroek.Willem@epamail.epa.gov  
[mailto:VandenBroek.Willem@epamail.epa.gov]  
Sent: Wednesday, April 22, 2009 11:20 AM  
To: Ex. 7  
Cc: Ex. 7  
Ex. 7  
Subject: Re: Pending Fees for Volkswagen Group Test Groups

Ex. 7

It's a good thing you're on top of this. I can't speculate on what exactly happened, but the forms you mailed to St. Louis evidently didn't make it to our contractor (the Bank is supposed to overnight them to them and to EPA in D.C.; through a kind of bureaucratic genius, I, who am supposed to problem shoot, never see them). This explains the lack of an acknowledgment. Can you send them to me, and I'll take care of it? In general, submitting the forms by pay.gov is foolproof (even if payment is done by some other method) as is sending them to fees@EPA.gov.

Thanks,

Bill

Ex. 7  
@  
Willem  
Sent by: VandenBroek/AA/USEPA/US@EPA  
Ex. 7  
cc

**Ex. 7**

Received Date:  
04/22/2009 11:06

**Ex. 7**

AM

**Ex. 7**

Transmission

Subject

Date:

Pending Fees for Volkswagen Group

04/22/2009

Test Groups

11:06:28 AM

Hello Bill;

Here is a listing of the last ten 2010 Audi test groups that were awaiting the fee filing forms to catch up with our electronic payment on April 3, 2009. The fee filing forms were mailed on April 1, 2009. If you would; please determine if these test groups are noted as being paid up. I have not received any email confirmation of their payment.

AADXT03.03LD  
AADXT04.23UD  
AADXV04.2365  
AADXV04.2375  
AADXV05.2385  
AADXV02.03UB  
AADXV02.03UA  
AADXV02.03PA  
AADXV03.03UF  
AADXJ03.23UC

Thank you,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 5/28/2009 2:25:26 PM  
**Subject:** Upcoming Test Waiver Requests  
<mailto:robert.hart@vw.com>

Hello Jim,

I took a quick look at the files.

There are two 2.0L turbo test groups with a total of 6 vehicle configurations that I will be submitting in the very near future.

Best regards,

Bob

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 5/29/2009 2:10:33 PM  
**Subject:** VW Test Group AVWXV02.5U35  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We received your confirmatory test waiver for VID VW35100056/10 (manual trans. Configuration 0).  
Thanks for your help.

As a heads, we have to correct Section 12 vehicle weights in the application recently submitted for this test group so it matches the verify vehicle data.

You should get a revised application and the pending confirmatory test supplemental information for VID VW35100052/10 (automatic trans. configuration 3) in the next few days.

Best regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 7/6/2009 5:33:18 PM  
**Subject:** FW: MY 2010 Conditional OBD Approval  
[AAD-OBDAADXT03.03LD E-09-148.pdf](#)  
<mailto:robert.hart@vw.com>

Hello Jim,

I forgot to Cc: you on this.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, July 06, 2009 8:54 AM  
To: 'Peavyhouse.Robert@epamail.epa.gov'  
Cc: Thomas, Suanne  
Subject: MY 2010 Conditional OBD Approval  
Importance: High

Hello Bob,

This is advance notice that I will be submitting an application for test group AADXT03.03LD today with a conditional OBD approval from CARB.

The conditional approval is related to the ARB's OBD Demonstration reporting requirement. Please see the attachment for details.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

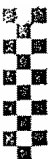
3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>



Linda S. Adams  
Secretary for  
Environmental Protection

## Air Resources Board

Mary D. Nichols, Chairman  
9480 Telstar Avenue, Suite 4  
El Monte, California 91731 [www.arb.ca.gov](http://www.arb.ca.gov)



Arnold Schwarzenegger  
Governor

July 1, 2009

Reference No. E-09-148

Dr. Christoph Kohnen  
General Manager  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Post-It® Fax Note	7671	Date	7/1/09	# of pages	5
To	VW	From	ARB		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	248-754-4207	Fax #	626-575-7012		

SUBJECT: Conditional Approval and Applicable Fines of Volkswagen's (VW) On-Board Diagnostic II (OBD II) System for 2010 Model Year Test Group AADXT03.03LD

Dear Mr. Kohnen:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2010 model year test group listed above. Representations made in the application indicate that the system is compliant with the OBD II regulation with the exception of exhaust gas recirculation (EGR) cooler circulation pump monitoring, EGR cooling thermostat monitoring, fuel quantity and timing monitoring, cold start emission reduction strategy monitoring, emissions increasing-auxiliary emission control device (EI-AECD) tracking, diesel oxidation catalyst (DOC) monitoring, and diesel particulate filter (DPF) monitoring. However, because discrepancies have been found in the OBD II demonstration data representing the test group identified as required by section (h)(1) of the OBD II regulation, ARB can only issue a conditional approval of the system design. The staff has determined that VW meets the factors that allow OBD II systems to be certified with deficiencies. As stated in the email sent by Ms. Suanne Thomas dated July 1, 2009, to Mr. Peter Ho, VW has agreed to pay fines for the third through seventh deficiencies as a condition of certification. Therefore, ARB approves the 2010 model year system with seven deficiencies. While not considered deficient, staff has concerns regarding urea pressure sensor rationality, and selective catalytic reduction (SCR) monitoring. Details of the deficiencies and concerns are noted below. Lastly, upon staff's review and approval of the demonstration data, the conditional status will be removed.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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Dr. Kohnen  
July 1, 2009  
Page 2

#### EGR Cooler Circulation Pump Monitor Deficiency

VW's EGR cooling system includes a water pump that is dedicated to the EGR cooling circuit. While the pump is monitored for circuit malfunctions, the OBD II system does not monitor the pump for proper functional response to computer commands as required by the OBD II regulation. As such, the EGR cooler circulation pump monitor is considered deficient.

#### EGR Thermostat Monitor Deficiency

VW's EGR cooling system includes a thermostat that is dedicated to the EGR cooling circuit. If the thermostat were to stay in a stuck open position, coolant would not be properly regulated through the cooler and could cause fouling and failure of the EGR cooler. VW contends that the EGR cooling efficiency monitor would pick up the fault and turn on the MIL when fouling causes the system to be ineffective. However, this would lead to unnecessary failures of the EGR cooler and would hinder a technician's ability to make effective repairs. The OBD II system does not monitor the thermostat for proper function and is therefore considered deficient.

#### Fuel Quantity and Timing Monitor Deficiency

For the 2010 model year, VW has introduced a new monitoring strategy to detect fuel quantity and timing malfunctions. There are a number of issues with this monitor and the demonstration testing. First, this strategy required five Unified test cycles to detect a malfunction, which are more cycles than permitted by the OBD regulation. Second, due to an error in the new monitoring strategy the monitor is only able to detect quantity and timing malfunctions that result in reduced quantity. High quantity malfunctions would still rely on the old zero fuel calibration strategy which requires approximately 1000 miles of driving with the malfunction present to detect a failure. Lastly, high quantity demonstration testing was not completed showing fault detection at the required emission levels because of the risk of engine damage. Without further justification, staff does not accept VW's claim that this test cannot be conducted without damaging the engine. For the reasons cited above, this monitor is considered deficient.

#### Cold Start Emission Reduction Strategy Monitoring Deficiency

VW has indicated that a cold start strategy is used on this vehicle, and each component involved in the cold start phase is individually monitored. In a presentation to ARB, VW showed monitors for the components involved in cold start. However, it was unclear how the components were operated during cold start and whether the OBD system will robustly verify the desired effect is achieved during cold start operation. VW has not



Dr. Kohnen  
July 1, 2009  
Page 3

shown that cold start monitoring requirements are met. Therefore the OBD II system is considered deficient for cold start monitoring.

#### DOC Monitoring Deficiency

Section (f)(1.2.3)(B) of the regulation requires malfunction detection when the catalyst is unable to generate the necessary feedgas constituents for proper SCR system operation. In previous presentations to ARB, VW has claimed that separate monitoring of feedgas generation is not possible. Instead, VW has claimed this failure mode should be covered by monitoring for non-methane hydrocarbon (NMHC) conversion. However, ARB is not fully convinced that deterioration of feedgas generation and NMHC conversion are directly correlated. Therefore, staff cannot conclude whether the NMHC conversion efficiency monitor will reliably detect a DOC malfunction when the catalyst is unable to generate the feedgas or whether further DOC deterioration will be necessary to fail the NMHC conversion monitor. The OBD II system is therefore deficient for monitoring of the DOC feedgas capability.

#### DPF Monitoring Deficiency

VW's DPF has a catalyzed coating to help particulate oxidation and extend filter durability. VW has claimed they do not rely on the catalyzed coating for NMHC conversion and monitoring for this function is not possible due to the negligible amount of exothermic reaction in this part. Despite this claim, emission test results with an uncoated DPF show a significant increase in NMHC emissions, though emissions remain below the OBD threshold of three times the emission standard. Section (f)(9.2.4) of the regulation allows for the use of a functional monitor in this case; however, VW's OBD II system does not have this monitor and is considered deficient.

#### EI-AECD Tracking Deficiency

For 2010 model year diesel vehicles, manufacturers are required to track and report EI-AECD activity as specified in section (g)(6.2) of the regulation. VW has identified EI-AECDs that should be tracked and reported. However, VW has not fully implemented the software to properly track and report the data to a generic scan tool. Consequently, no EI-AECD data will be reported to a scantool. Therefore, the OBD II system is considered deficient for failing to meet EI-AECD tracking requirements. Furthermore, to resolve this deficiency for future model years and so staff can confirm VW's determination on the EI-AECDs that need to be tracked and reported, VW is required to fully document its AECDs and EI-AECDs as required by section (i)(2.15) of the regulation.

Dr. Kohnen  
July 1, 2009  
Page 4

### Conditional Approval and Fuel System Demonstration Concern

The OBD II system detects a malfunction for fuel pressure deviation when the difference between commanded and actual fuel pressure reaches a calibrated threshold. When a malfunction is detected, engine torque is reduced to protect the engine and it is not possible to drive the emission test cycle. In order to determine the emission levels when a fault is detected, a malfunction is induced to simulate a worst performing acceptable system (i.e., a barely passing system) via software modification. Specifically, the fuel pressure setpoint was altered in the engine control module (ECM) to simulate engine operation with a malfunction that results in higher or lower than normal pressures. Due to the ability of the fuel system to control to the new setpoint commanded by the ECM, VW claimed there was no resultant deviation measured between the commanded and actual fuel pressures. Staff is concerned that the emission data are not representative of the emission levels from a system that is operating near the malfunction criteria. Therefore staff cannot conclude the emission thresholds are satisfied based on these data. In order to remove the conditional approval VW is required to perform additional tests that result in a deviation near the threshold. Additionally, this chosen method of fault simulation is acceptable for the 2010 model year. However, for future model year approval, VW is required to demonstrate that the computer modifications yield equivalent results to hardware modifications. Further, VW is required to make this demonstration in all cases where computer modifications are used in lieu of hardware modifications.

### SCR Time to Closed Loop Concern

Section (f)(2.2.3)(D) of the OBD II regulation requires the OBD II system to detect a malfunction when the SCR system fails to enter closed loop feedback control within a manufacturer's specified time interval. In lieu of monitoring the SCR system for time to enter closed loop, VW is individually monitoring all the components and parameters that are used as inputs to closed loop control. In order to enter closed loop control, VW waits for temperature sensor T6 to exceed 100°C. Monitoring for this temperature occurs after a specific amount of heat has been put into the exhaust system. If the temperature has not been reached after this condition, a malfunction is detected. VW has claimed the monitor is calibrated to a worse case scenario of a drive cycle at continuous idle at -7°C ambient temperature. Staff has concerns this monitor is calibrated too conservatively and may take longer than necessary to detect a malfunction under less than worst case scenarios.

Dr. Kohnen  
July 1, 2009  
Page 5

Urea Pressure Sensor Rationality Monitoring Concern

Staff has concerns that the urea sensor out of range high monitoring threshold was calibrated too high (i.e., 4.86V on a 5V sensor) and will only detect extreme deterioration. In a presentation to ARB, VW showed that frozen urea can cause a rise in measured pressure causing the sensor to read a high voltage value under extreme cold ambient conditions. Staff understands VW is considering a two threshold strategy for future model years to enhance the rationality check and address staff's concerns.

Under the deficiency provisions of section (k) of the OBD II regulation, VW is subject to fines of \$150 per vehicle for each vehicle produced for sale in California from the above test group. Such fines are to be paid to the State Treasurer for deposit in the Air Pollution Control Fund. The total fines that VW will be required to pay will be based on production and distribution records provided by VW for the 2010 model year. VW could limit its total liability should it elect to implement a running change correcting one or more of these deficiencies during the model year. Vehicles produced subsequent to such changes would be subject to lesser fines.

Should you have questions or comments regarding this letter, please have your staff contact Peter Ho at (626) 459-4392.

Sincerely,

*Michael J. Regan for SGA*

Steve Albu, Assistant Chief  
Mobile Source Control Division

cc: Peter Ho  
Engineering Evaluation Section

**To:** Robert Peavyhouse/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 7/8/2009 9:15:30 PM  
**Subject:** MY 2010 Conditional OBD Approval for Test Group AVWXV02.0U5N  
[AVW-OBD-AVWXV02.0U5N- E-09-150.pdf](#)  
<mailto:robert.hart@vw.com>

Hello Bob and Jim,

This is advance notice that I will be submitting an application for test group AVWXV02.0U5N today with a conditional OBD approval from CARB.

The conditional approval is related to the ARB's OBD Demonstration reporting requirement. Please see the attachment for details.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>



Linda S. Adams  
Secretary for  
Environmental Protection

# Air Resources Board

Mary D. Nichols, Chairman  
9480 Telstar Avenue, Suite 4  
El Monte, California 91731 [www.arb.ca.gov](http://www.arb.ca.gov)



Arnold Schwarzenegger  
Governor

July 3, 2009

Reference No. E-09-150

Dr. Christoph Kohnen  
General Manager  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Post-It® Fax Note	7671	Date	7/3/09	# of pages	4
To	VW	From	CARB		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	248-754-4207	Fax #	626-575-7012		

SUBJECT: Conditional Approval and Applicable Fines for Volkswagen's (VW) On-Board Diagnostics II (OBD II) System Design for 2010 Model Year Test Group AVWXV02.035N

Dear Dr. Kohnen:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2010 model year test group listed above. Representations made in the application indicate that, with the exception of exhaust gas recirculation (EGR) monitoring, fuel quantity and timing monitoring and diesel particulate filter (DPF) monitoring, the system meets the requirements of the OBD II regulation. However, because staff has not completed a review of the submitted OBD II demonstration data representing the test group identified above as required by section (h)(1) of the OBD II regulation, ARB can only issue a conditional approval of the system design. Therefore, ARB conditionally approves the 2010 model year system design for the above test group with three deficiencies. As stated in the email sent by Ms. Suanne Thomas dated July 3, 2009, to Mr. Peter Ho, VW has agreed to pay fines for the third deficiency as a condition of certification. While not considered deficient, staff also has concerns regarding NOx adsorber time to closed loop monitoring, fuel pressure monitoring, and emissions increasing-auxiliary emission control device (EI-AECD) tracking. Details regarding the deficiencies and concerns are discussed below. Upon completion of staff's review and approval of the demonstration data, the conditional status will be removed.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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Dr. Kohnen  
July 3, 2009  
Page 2

### DPF Monitoring Deficiency

VW's DPF has a catalyzed coating to help particulate oxidation and extend filter durability. VW has claimed they do not rely on the catalyzed coating for NMHC conversion and monitoring for this function is not possible due to the negligible amount of exothermic reaction in this part. VW has provided emission data from a test with an uncoated diesel oxidation catalyst and DPF, and emissions were below the OBD threshold of three times the emission standard. Section (f)(9.2.4) of the regulation allows for the use of a functional monitor in this case; however, VW's OBD II system does not have this monitor and is considered deficient.

### EGR Monitoring Deficiency

Section (f)(6.2.3) requires the OBD II system to detect slow response malfunctions under both increasing and decreasing EGR flow rates. VW monitors for proper EGR valve closing by comparing a modeled air mass flow to actual air mass flow. The monitor is run under fuel cut conditions where EGR is shut off quickly. If the EGR system were slow to respond when the valve is commanded closed, this would have a significant influence on measured airflow and cause a fault to be detected. However the fuel cut diagnostic would not detect slow EGR response in the increasing direction (e.g., when commanding the valve open). In addition to the slow response issues discussed above, staff has concerns regarding EGR low and high flow monitoring, which are required to be monitored continuously. Non-continuous operation may be approved if VW demonstrates that disablement is limited to conditions where a properly operating EGR system cannot be distinguished from a malfunctioning EGR system and the disablement interval is limited only to that which is technically necessary. VW's high and low flow monitors are not monitored continuously. While VW has stated the disablements are necessary for robust detection of EGR malfunctions, VW has not provided data to justify the disablements. Considering these issues regarding EGR monitoring, the OBD II system is deficient for EGR monitoring. To remove this deficiency, VW will be required to monitor and detect slow response in both directions, and submit data to justify disable conditions for the EGR high and low flow monitors.

### Fuel Quantity and Timing Monitor Deficiency

For the 2010 model year, VW has introduced a new monitoring strategy to detect fuel quantity and timing malfunctions. This strategy required six Federal Test Procedure cycles to detect a malfunction, which are more cycles than permitted by the OBD regulation. VW has stated it may be possible to detect the malfunction on as few as two Unified cycles due to the increased amount of fuel cut time over the test cycle; however, VW has not yet conducted testing over the Unified cycle. The quantity and timing

Dr. Kohnen  
July 3, 2009  
Page 3

monitor is therefore considered deficient because it takes too many test cycles to detect the malfunction. The deficiency will be removed if VW demonstrates detection in two Unified cycles.

#### NOx Adsorber Time to Closed Loop Concern

Section (f)(8.2.3)(A) of the OBD II regulation requires the OBD II system to detect a malfunction when the NOx adsorber system fails to enter feedback control within a manufacturer's specified time interval. In lieu of monitoring the SCR system for time to enter closed loop, VW is individually monitoring all the components and parameters that are used as inputs to closed loop control. In order to enter closed loop control, VW waits for the temperature sensor upstream of the NOx adsorber to exceed 230°C. Monitoring for the temperature sensor occurs after a modeled temperature of 300°C is reached. If the temperature sensor does not read 230°C after the model has reached 300°C, then a malfunction will be detected. VW has provided some data to show that the modeled temperature will exceed 300°C under both city and highway driving conditions. However, based on these limited data, staff cannot fully assess how long after start a properly functioning system reaches 230°C and how long the monitor takes to detect a malfunction. Staff has concerns this monitor may require more time than necessary to detect a malfunction. To avoid a future deficiency determination, VW should explain how the model is calculated, why the model was calibrated to 300°C, and provide data showing the performance of the monitor following an engine start.

#### Fuel Pressure Monitoring Concern

Fuel pressure monitoring requires a fuel temperature of greater than -20°C to be enabled. The only diagnostic for fuel temperature occurs at cold start sensing a shift from other temperature sensors of  $\pm 30^\circ\text{C}$ . Staff has concerns that a sensor stuck below -20°C at cold soak temperatures below 10°C could cause fuel system pressure monitoring to be disabled without notification to the driver or a technician. VW has suggested it can lower the fuel pressure enable temperature to -27°C to mitigate staff's concerns. Staff accepts this proposal. However, as diesel diagnostic systems are refined, staff may require additional rationality monitoring (e.g., a monitor that verifies the sensor warms up) of the fuel temperature sensor.

#### EI-AECD Tracking Concern

For 2010 model year diesel vehicles, manufacturers are required to track and report EI-AECD activity as specified in section (g)(6.2) of the regulation. VW has assessed its AECDs and has not identified any EI-AECDs that should be tracked and reported. Therefore, no EI-AECDs are reported to a generic scan tool. Due to documentation

Dr. Kohnen  
July 3, 2009  
Page 4

issues, staff has concerns that EI-AECDs which require tracking may exist in VW's system and have not been identified. For example, staff is concerned there may be conditions where NOx adsorber regeneration will not occur (e.g., due to high temperature or load) and vehicle operation under such conditions would require tracking. To resolve this concern and so staff can confirm VW's determination on the EI-AECDs that need to be tracked and reported, VW is required to fully document its AECDs and EI-AECDs as required by section (i)(2.15) of the regulation.

Under the deficiency provisions of section (k) of the OBD II regulation, VW is subject to fines of \$50 per vehicle for each vehicle produced for sale in California from the above test group. Such fines are to be paid to the State Treasurer for deposit in the Air Pollution Control Fund. The total fines that VW will be required to pay will be based on production and distribution records provided by VW for the 2010 model year. VW could limit its total liability should it elect to implement a running change correcting one or more of these deficiencies during the model year. Vehicles produced subsequent to such changes would be subject to lesser fines.

Should you have questions or comments regarding this letter, please have your staff contact Peter Ho at (626) 459-4392.

Sincerely,

  
Steve Albu, Assistant Chief  
Mobile Source Control Division

cc: Peter Ho  
Engineering Evaluation Section



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 7/21/2009 2:41:06 PM  
**Subject:** MY 2010 Bentley Continental GTC Running Change Letter  
<mailto:robert.hart@vw.com>

Hello Jim,

I submitted the attached running change letter through the Verify system.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 7/27/2009 6:36:46 PM  
**Subject:** RE: A3UC-CAF

Thanks for the info Vince.

Best regards,

Bob Hart

-----Original Message-----

From: Mazaitis.Vincent@epamail.epa.gov  
[mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, July 27, 2009 2:03 PM  
To: Hart, Robert (VWoA)  
Subject: Fw: A3UC-CAF

Let's try this again!

----- Forwarded by Vincent Mazaitis/AA/USEPA/US on 07/27/2009 02:01 PM  
-----

From: Vincent Mazaitis/AA/USEPA/US

To: roberthart@vw.com

Cc: Jim Snyder/AA/USEPA/US@EPA, Ben Haynes/AA/USEPA/US@EPA,  
Vanamburg.David@epamail.epa.gov

Date: 07/27/2009 01:04 PM

Subject: A3UC-CAF

Hello Bob,

the subject vehicle is scheduled to test on Thursday 7/30/09. I will talk with the lab on Wednesday to try to establish a time. I'll contact you as soon as I know when to expect the vehicle to be tested.

If you have any questions or concerns, please contact Jim Snyder or me.

Thanks,

Vince Mazaitis  
(734) 214-4864

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard"  
**Sent:** Tue 8/18/2009 1:36:30 PM  
**Subject:** RE: Help with the Cash for clunkers -- Please respond with answers to our questions or the missing data in the attached spread sheet: 2009 Audi A6 w/FWD 3.1L  
[Dec 08 Notice EPA gen labels.pdf](#)

Hello Jim;

The 2009 Audi A6 models were as follows: 2009 Audi A6 quattro and A6 Avant quattro (AWD) were certified in both 4.2L V8 and 3.0L supercharged V6 test groups and labeled for fuel economy, at that time, in CEFIS. We did certify a 2009 3.1L naturally aspirated V6 for the Audi A6 front wheel drive with CVT transmission. This 3.1L test group was issued a certificate of conformity in CEFIS, late in the season. Because none of the certification data existed in Verify and EPA switched to use the Verify system for labeling, it was not processed in the Verify system, but rather a letter of self approved label values was sent to Dave Good as he requested, copy attached. The values are listed on the attachment to the December 15, 2008 letter.

There are other 3.2L V6 models that exist in 2009, these were A4 quattro and A5 quattro models but no 3.2L Audi A6. The 2010 Audi A6 3.2L with (front) CVT transmission was labeled and certified in Verify.

Please call me with your questions.

Best regards,

Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, August 17, 2009 5:37 PM  
To: Thomas, Richard  
Cc: Good.David@epamail.epa.gov; Peavyhouse.Robert@epamail.epa.gov; Ball.Joel@epamail.epa.gov  
Subject: Help with the Cash for clunkers -- Please respond with answers to our questions or the missing data in the attached spread sheet: 2009 Audi A6 w/FWD 3.1L

Okay I looked at our database and Cars.gov site again. For 2009, the only A6s listed are the A6 Quattro and A6 Quattro Avant. These are AWD and listed with a 3.0L(super charged) or 4.2L V8.

There is no data for any FWD A6 models. There is no data for any 3.1L. Also, the magazines say there is a 3.2L for 2009 which is confusing. Did we get data on these? If not please supply.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Dave Good  
Certification & Compliance Division  
U.S. Environmental Protection Agency  
2000 Traverwood  
Ann Arbor, Michigan 48105

Richard E. Thomas Jr. NAME  
Certification Strategist TITLE  
EEO DEPARTMENT  
248 754 4213 PHONE  
248 754 4207 FAX  
Richard.Thomas@VW.com E-MAIL

December 15, 2008 DATE

Subject: Notice of Self-Approval of 2009 Audi General Label Fuel Economy Values

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Dear Mr. Good,

In accordance with 40 CFR Part 600, we are notifying EPA of the Self-Approval of 2009 model year general fuel economy label values for the following models:

Audi A6 quattro (3.0L)  
Audi A6 Avant quattro (3.0L)  
Audi Q5 (3.2L)  
Audi A6 (3.1L)

The first three models listed, use the full 5 cycle test method while the Audi A6 (3.1L) uses the derived 5-cycle method. All the values are contained in the following attachment.

If you require additional information or have any questions please contact me directly at (248) 754-4213.

Sincerely,



Richard E. Thomas Jr.  
Engineering and Environmental Office

attachments

EPA FOIA Production 2016-09-01

2015-011272\_003036

2009 Fuel prices: P = Premium Unleaded Gasoline \ \$4.30 = unit price per gallon

**To:** "Hopson, Janet L." [hopsonjl@ornl.gov]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard"  
**Sent:** Thur 8/20/2009 6:47:22 PM  
**Subject:** RE: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if possible [Need unadj city/hwy/comb mpg values]  
[Audi A6 3.1L 2009 FE.pdf](#)

Hello Janet;

The unadjusted label values for this 3.1L V6 2009 Audi A6 with CVT transmission is: 22.9000 city; 37.3000 highway; 27.7148. Please see the Verify printout index 45 (attached) from my attempt to input it into the system. If you have any questions please feel free to call me.

Thanks,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

-----Original Message-----

**From:** Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
**Sent:** Thursday, August 20, 2009 12:00 PM  
**To:** Thomas, Richard  
**Cc:** Hopson, Janet L.; Snyder.Jim@epamail.epa.gov  
**Subject:** RE: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov and cars.gov if possible [Need unadj city/hwy/comb mpg values]

Richard,

Please send Janet & all of us the unadjusted city, hwy and combined mpg values for this vehicle.

Thanks

**From:** "Hopson, Janet L." <hopsonjl@ornl.gov>

**To:** David Good/AA/USEPA/US@EPA



Date: 08/20/2009 10:45 AM

Subject: RE: Please add 2009 Audi A6 3.1L Auto(AV) to  
www.fueleconomy.gov and cars.gov if possible

We'll fix this. Any chance we could get the unadjusted numbers?

Janet

-----Original Message-----

From: Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
Sent: Thursday, August 20, 2009 10:39 AM  
To: Hopson, Janet L.  
Cc: Li, Jia; Snyder.Jim@epamail.epa.gov; richard.thomas@vw.com  
Subject: Please add 2009 Audi A6 3.1L Auto(AV) to www.fueleconomy.gov  
and cars.gov if possible

Janet,

Here's one which slipped thru the cracks. The data was partially in our  
old CFEIS data base and partially in our new Verify data base. If  
possible can you put it on the web?

[Note: The other A6 and Q5 models in the pdf should already be on the  
web.]

Thanks

Dave

----- Forwarded by David Good/AA/USEPA/US on 08/20/2009 10:32 AM -----

From: Debra Piper/AA/USEPA/US

To: David Good/AA/USEPA/US@EPA

Date: 08/20/2009 08:44 AM

Subject: Scan of chart for VW

(See attached file: Volkswagon Economy Guide.pdf)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 10/6/2009 6:33:10 PM  
**Subject:** VW Group: Cold NMHC Phase In  
[93PA sec 01-15 update 2.pdf](#)  
[93UA sec 01-15 update 2.pdf](#)  
[93UB sec 1-15 update 2.pdf](#)  
[CommSection 16 2009 update 2.pdf](#)  
<mailto:robert.hart@vw.com>

Hello Jim,

The attachments contain the application/Common Sections pages that I am going to add to the related applications and common section for MY 2009. I will be adding similar pages to the 2010 application updates.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

<b>Section 5</b>	<b>Pg. 1</b>	<b>Test Group Description</b>	<b>Engine Code</b>	<b>R.CH-No.:</b>	<b>Revision Date</b>
<b>Test Group</b>		<b>9AD XV02.03PA</b>	<b>all</b>		<b>09-28-2009</b>

### 5.1 Test Group Description

Test Group Name	9AD XV02.03PA
Summary Sheet Number	640T2-04
Engine displacements covered	2.0 liters
Arrangement and number of cylinders	I 4
Vehicle class (es) covered	LDV
Federal Emissions Standards Class	Tier 2 BIN 2
California Emissions Standards Class	LEV II SULEV / Zero EVAP (Qualifies as PZEV)

### 5.2 Test Group Emission Standards

Please refer to CFEIS Summary sheet included in Section 7 for applicable emission standards.

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with §86.1811-10, all vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL):

Certification FEL = 0.3 g/mi

Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

<b>Section 5</b>	<b>Pg. 2</b>	<b>Test Group Description</b>	<b>Engine Code</b>	<b>R.CH-No.:</b>	<b>Revision Date</b>
<b>Test Group</b>		<b>9AD XV02.03UA</b>	<b>all</b>		<b>09-28-2009</b>

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with §86.1811-10, the following vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL):

Certification FEL = 0.3 g/mi

Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

Model	Engine Code	Transmission
A3	CCTA	DQ250-6F
A3	CCTA	MQ350-6F
A3 quattro	CCTA	DQ250-6A
TT Coupe quattro	CCTA	DQ250-6AT
TT Roadster quattro	CCTA	DQ250-6AT
TTS Coupe	CDMA	DQ250-6AS
TTS Roadster	CDMA	DQ250-6AS
Eos	CCTA	DQ250-6F
Eos	CCTA	MQ350-6F
Jetta	CCTA	DQ250-6F
Jetta	CCTA	MQ350-6F
Jetta Sportwagen	CCTA	DQ250-6F
Jetta Sportwagen	CCTA	MQ350-6F
GTI	CCTA	DQ250-6F
GTI	CCTA	MQ350-6F

<b>Section 5</b>	<b>Pg. 1</b>	<b>Test Group Description</b>	<b>Engine Code</b>	<b>R.CH-No.:</b>	<b>Revision Date</b>
<b>Test Group</b>		9AD XV02.03UB	all		09-28-2009

### 5.1 Test Group Description

Test Group Name	9AD XV02.03UB
Summary Sheet Number	640T2-20
Engine displacements covered	2.0 liters
Arrangement and number of cylinders	I-4 longitude
Vehicle class(es) covered	LDV
Federal Emissions Standards Class	Tier 2 BIN 5
California Emissions Standards Class	LEV-II ULEV

### 5.2 Test Group Emission Standards

Please refer to CFEIS Summary sheet included in Section 7 for applicable emission standards.

### 5.3 Test Group Cold NMHC Emission Standards

In accordance with §86.1811-10, all vehicles of this test group are part of the Cold NMHC phase in and are certified to fulfill the following family emission limits (FEL):  
Certification FEL = 0.3 g/mi  
Interim in-use FEL = 0.4 g/mi (MY 2009, 2010, 2011, 2012)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 10/7/2009 7:02:14 PM  
**Subject:** VW Group: Field Fixes in the Verify System  
<mailto:robert.hart@vw.com>

Hello Jim,

A total of 13 field fixes for the following test groups have been uploaded to the Verify System over the last two days.

6AD XV02.0366 (2)  
7AD XV02.0366 (2)  
8AD XV02.0366 (1)  
9AD XV02.0366 (1)

6AD XV02.0352 (1)  
7AD XV02.0352 (1)  
8AD XV02.0352 (1)  
9AD XV02.0352 (1)

9AD XV02.03UA (1)  
AAD XV02.03UA (1)

6VWXV03.2535 (1)

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 10/19/2009 3:41:50 PM  
**Subject:** VW Group: Test Waiver Requests Submitted  
<mailto:robert.hart@vw.com>

Hello Jim,

This is just a "heads up" that I submitted two test waiver request for MY 2011 Audi carryover Test Group BADXV05.2LR8. Both vehicles were tested due to a higher ETW for the R8 Spyder. The automated manual transmission version is a new "worst case" for this test group.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Reineke, Dennis" [Dennis.Reineke@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 10/27/2009 3:24:57 PM  
**Subject:** AVWXV02.03PA  
<mailto:robert.hart@vw.com>

Hello Jim,

Here's the names and phone numbers we spoke about again just in case.

Dennis Reineke - 248-754-4215  
Bill Rodgers - 248-754-4219

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 11/9/2009 7:34:48 PM  
**Subject:** VW Group: MY 2010 Volkswagen Running Change/Field Fix  
CBI\_AVWXV03.6U46\_APP\_C01\_R00.PDF

Ex. 7

Hello Jim,

While I was on vacation, a mixture of twenty VW and Audi field fixes were submitted to Verify. Field fix 01 for test group AVWXV03.6U46 was addressed to Dave Good instead of you. I have attached a copy for your convenience.

If you need a list of all twenty of the submitted field fix documents, let me know.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

November 2, 2009 Date

Subject: Running Change/Field Fix for MY 2010 Volkswagen Test Group  
AVWXV03.6U46.

Dear Mr. Good,

With this letter we wish to inform the agency of a running change/field fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group : AVWXV03.6U46  
Evaporative Family : AVWXR0125246  
Models : Volkswagen CC, CC 4motion, Passat 4motion,  
Passat Wagon 4motion  
Transmission : S6 automatic

The enclosed page describes running change/field fix RF\_AV3.6U46\_01\_09 which is for updated transmission software to improve drivability.

If you have any questions with regard to this information please contact our office in Auburn Hills at ( **Ex. 7** )

Sincerely,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

Enclosure(s)

Subject: **Running Change / Field Fix**  
R/Ch / FFix.-No.: **RF\_AV3.6U46\_01\_09**  
Test Group **AVWXV03.6U46 (MY 2010)**  
Description: **Updated ECM with new software calibration to improve driveability while downshifting manually during high engine loads.**

	ECM		
	Part.No.	Calibration No.	
Passat CC Passat Passat wagon	03H 906 032 FP	5149	A44E9AA5
Passat CC 4motion Passat 4motion Passat wagon 4motion	03H 906 032 FQ	5150	0EAE9C44

Vehicles affected: Vehicle CC, CC 4motion, Passat 4motion, Passat Wagon 4motion  
Drive: FWD / AWD  
Engine: 3.6l/250 hp  
Transmission: S6

Reason: Engine behavior too rough while downshifting manually during high engine loads in gear 1, 2 and 3

Request applies to: **Hardware Modification; Physical Spec.: NO**  
**Calibration: YES**  
new software calibration to address better drivability  
**Application Correction NO**

Implementation date: November 2009 rolling;  
New ecm software calibration will be installed in production and made available for service

Vehicles used for testing: n.a.

Engine Code: **BLV**

Impact on emissions: This software change has no impact on emissions

List of **ECM** currently certified

<b>Engine Control Module</b>						
<b>Carline</b>	<b>Trans mission</b>	<b>Engine Code</b>	<b>Part. No.</b>	<b>Cal. ID software calibration ID</b>	<b>CVN calibration verification no</b>	<b>Remarks</b>
<b>Passat CC</b>	<b>L 6 FWD</b>	<b>BLV</b>				
			03H 906 032 FP	4735	96639F99	SOP
				5149	A44E9AA5	FF_AV3.6U46_01_09
<b>Passat CC Passat Passat wagon</b>	<b>L 6 AWD</b>	<b>BLV</b>				
			03H 906 032 FQ	4736	69197E5D	SOP
				5150	0EAE9C44	FF_AV3.6U46_01_09

## Running Change / Field Fix Log

Model Year: 2010  
Test Group: AVWXV03.6U46  
Models: Volkswagen CC, CC 4motion, Passat 4motion, Passat Wagon 4motion  
Evaporative Family: AVWXR0125246

RC / FF Number	Description of Change / Reason	Date
RF_AV3.6U46_01_09	Update TCM to improve drivability during manual downshifts	Nov 02, 2009

Prefix:  
RC = Running Change  
RF = Running Change / Field Fix  
FF = Field Fix

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 11/9/2009 8:42:03 PM  
**Subject:** VW Group: More Field Fixes Addressed to Dave Good  
[CBI\\_9VWXV03.2535\\_APP\\_F02\\_R00.PDF](#)  
[CBI\\_AVWXV02.03SA\\_APP\\_F01\\_R00.PDF](#)  
[CBI\\_AVWXV02.03UA\\_APP\\_F01\\_R00.pdf](#)  
Ex. 7

Hello Jim,

I found three more field fixes addressed to Dave Good. I attached copies for your convenience.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

October 30, 2009 Date

Subject: Field Fix for MY 2009 Volkswagen Test Group 9VWXV03.2535.

Dear Mr. Good,

With this letter we wish to inform the agency of a field fix for the following test group:

Test Group	9VWXV03.2535
Evaporative Family	9VWXR0110238
Models	Volkswagen Eos, Audi A3 quattro, TT Coupe quattro, TT Roadster quattro
Transmission	S6 (DSG Direct Shift Gearbox)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

The enclosed page describes field fix FF\_9V3.2535\_02\_08 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)



## **Field Fix MY 2009**

**Subject:**                      **Test Group:**                      9VWXV03.2535

**Models:**                      Volkswagen EOS,  
   Audi A3 quattro, TT quattro, TT coupe quattro

**Transmission:**                      DQ250-6F, DQ250-6A

**Event:**                      Gearbox clutch temperature sensor has the potential to falsely detect a high oil temperature.

**Analysis:**                      Wiring harness of the temperature sensor may have connector wires that were insufficiently crimped during a limited production period.

**Activities:**                      Gearbox reprogramming with updated software. The affected temperature sensor will be deactivated and replaced by an modelled temperature.

Vehicle Type	Calibration Identification		Calibration Verification	Release Date
Volkswagen EOS	02E 300 051 Q	1949	8a67	Oct 09
Audi A3 quattro	02E 300 011 DB	1952	0d6a	
Audi TT quattro	02E 300 011 DB	1951	bcc9	
Audi TT coupe quattro	02E 300 011 DB	1951	bcc9	

**Impact on**                      This change does not cause an impact on emissions.

**Emissions:**

Volkswagen, EASZ  
10-29-2009

## Running Change / Field Fix Log

Model Year: 2009  
Test Group: 9VWXV03.2535  
Evaporative Family: 9VWXR0110238  
Models: Audi TT Coupe quattro, TT Roadster quattro

RC / FF Number	Description of Change / Reason	Date
RC_9VW3.2535_01_08	Increased curb weight / ETW for TT Coupe quattro.	SOP
FF_9V3.2535_02_09	transmission software to correct erroneous high oil temperature faults	Oct 2009

### Prefix:

RC = Running Change

FF = Field Fix

RF = Running Change / Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

October 30, 2009 Date

Subject: Field Fix for MY 2010 Volkswagen Test Group AVWXV02.03SA.

Dear Mr. Good,

With this letter we wish to inform the agency of a field fix for the following test group:

Test Group	AVWXV02.03SA
Evaporative Family	AVWXR0110238
Models	Volkswagen Eos
Transmission	S6 (DSG Direct Shift Gearbox)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

The enclosed page describes field fix FF\_AV2.03SA\_01\_09 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

## **Field Fix MY 2010**

**Subject:**           **Test Group:**           AVWXV02.03SA  
**Models:**           Volkswagen EOS  
**Transmission:**       DQ250-6F

**Event:**           Gearbox clutch temperature sensor has the potential to falsely detect a high oil temperature.

**Analysis:**       Wiring harness of the temperature sensor may have connector wires that were insufficiently crimped during a limited production period.

**Activities:**      Gearbox reprogramming with updated software. The affected temperature sensor will be deactivated and replaced by a modelled temperature.

<b>Vehicle Type</b>	<b>Calibration Identification</b>		<b>Calibration Verification</b>	<b>Release Date</b>
Volkswagen EOS	02E 300 051 P	1940	ffbb	Oct 09

**Impact on**  
**Emissions:**      This change does not cause an impact on emissions.

Volkswagen, EASZ  
10-29-2009

## Running Change / Field Fix Log

Model Year: 2010  
Test Group: AWWXV02.03UA  
Models: Volkswagen Eos, CC, Passat, Passat Wagon  
Evaporative Family: AWWXR0110238

RC / FF Number	Description of Change / Reason	Date
FF_AV2.03UA_01_09	DSG transmission software update for erroneous high oil temp faults.	Oct 30, 2009

Prefix:

RC = Running Change

RF = Running Change / Field Fix

FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. David Good  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

October 30, 2009 Date

Subject: Field Fix for MY 2010 Volkswagen Test Group AVWXV02.03UA.

Dear Mr. Good,

With this letter we wish to inform the agency of a field fix for the following test group:

Test Group	AVWXV02.03UA
Evaporative Family	AVWXR0110238
Models	Volkswagen Eos
Transmission	S6 (DSG Direct Shift Gearbox)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

The enclosed page describes field fix FF\_AV2.03UA\_01\_09 which is for updated transmission software to correct erroneous high oil temperature faults.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

## **Field Fix MY 2010**

**Subject:**                      **Test Group:**                      AVWXV02.03UA  
**Models:**                      Volkswagen EOS  
**Transmission:**                      DQ250-6F

**Event:**                      Gearbox clutch temperature sensor has the potential to falsely detect a high oil temperature.

**Analysis:**                      Wiring harness of the temperature sensor may have connector wires that were insufficiently crimped during a limited production period.

**Activities:**                      Gearbox reprogramming with updated software. The affected temperature sensor will be deactivated and replaced by a modelled temperature.

Vehicle Type	Calibration Identification		Calibration Verification	Release Date
Volkswagen EOS	02E 300 051 P	1940	ffbb	Oct 09

**Impact on**  
**Emissions:**                      This change does not cause an impact on emissions.

Volkswagen, EASZ  
10-29-2009

## Running Change / Field Fix Log

Model Year: 2010  
Test Group: AWWXV02.03UA  
Models: Volkswagen Eos, CC, Passat, Passat Wagon  
Evaporative Family: AWWXR0110238

RC / FF Number	Description of Change / Reason	Date
FF_AV2.03UA_01_09	DSG transmission software update for erroneous high oil temp faults.	Oct 30, 2009

Prefix:

RC = Running Change

RF = Running Change / Field Fix

FF = Field Fix



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 11/10/2009 8:52:31 PM  
**Subject:** RE: VW certification information request

Hello Jim,

I am sadly mistaken. I don't have Veteran's Day off. I was looking at the wrong calendar.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, November 10, 2009 3:39 PM  
To: Hart, Robert (VWoA)  
Subject: Fw: VW certification information request

Bob, a chemical engineer in the Advanced Technology Division is reviewing the 2010 TDI diesel in the Jetta, test group AVWXV02.0U5N. He asked me for the details on the aftertreatment and I couldn't find some of it in the certificate application documentation as required. Specifically information on the type of catalysts, catalyst loadings/volumes, DPF volume, and LNT loadings. Please supply the requested info, thanks.

Here is his note:

Jim hi, ... I was wondering if you could look up the 2010 Jetta and give me the particulars on the aftertreatment, type of converters/DPFs/LNT, catalyst loadings, volumes, etc, ... Lynn Sohacki told me you were the VW contact, thanks, Greg

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 11/13/2009 3:09:39 PM  
**Subject:** VW Group: Requested Information for MY 2010 2.0l Diesel Aftertreatment  
Volkswagen-MY2010 Golf-Jetta diesel OC-PTOX-NSC characteristics.doc  
mailto:robert.hart@vw.com

Hello Jim,

Please let me know if the attached information is sufficient.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

mailto:robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 11/16/2009 3:35:02 PM  
**Subject:** Confirmatory Test Schedule for EDV: 462 00184/10  
<mailto:robert.hart@vw.com>

Hello Jim,

Germany is having problems with shipping and need to delay the confirmatory test for EDV: 462 00184/10 by a week. The current schedule for the test is 12/2/2009.

Please reschedule the test for this vehicle for the second week of December if possible.

Best regards,

Bob Hart

Robert Hart

Emissions & Regulatory Analyst

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 12/24/2009 12:53:31 AM  
**Subject:** VW Group: MY 2000 Audi Field Fixes  
CBI YAD XV01.8332 APP F02 R00.PDF  
CBI YAD XV01.8336 APP F03 R00.PDF

Hello Jim,

Attached you will find two MY 2000 Audi ignition coil related field fixes. MY 2000 is too old to upload to the VERIFY System.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2000 Audi Test Group YAD XV01.8332

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	YAD XV01.8332
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_YA1.8332\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2000

**Subject:**

**Field Fix Nr.:** FF\_YA1.8332\_02\_09  
**Model Year** 2000  
**Test Group:** YADXV01.8332  
**Models:** all  
**Transmission:** all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**

**Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## **Running Change / Field Fix Log**

Model Year: 2000  
Test Group: YAD XV01.8332  
Evaporative Family: YAD XR0140232  
Models: Audi A4, A4 quattro  
VW Passat, Passat Wagon

RC / FF Number	Description of Change / Reason	Date
FF_YA1.8332_01_09	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part protection and an adjusted EVAP monitor below 40°F.	Feb. 24. 2009
FF_YA1.8332_02_09	Replacement Ignition Coil	December 2009

Prefixes:

RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2000 Audi Test Group YAD XV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	YAD XV01.8336
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_YA1.8336\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)



# **Field Fix MY 2000-2002**

**Subject:**

<b>Field Fix Nr.:</b>	FF_YA1.8336_03_09	FF_1A1.8336_02_09
<b>Model Year</b>	2000	2001
<b>Test Group:</b>	YAD XV01.8336	1AD XV01.8336
<b>Models:</b>	all	all
<b>Transmission:</b>	all	all

<b>Field Fix Nr.:</b>	FF_2A1.8336_02_09
<b>Model Year</b>	2002
<b>Test Group:</b>	2AD XV01.8336
<b>Models:</b>	all
<b>Transmission:</b>	all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on****Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2000  
Test Group: YAD XV01.8336  
Evaporative Family: VW: 1ADXR0110234  
Audi: 1ADXR0130242  
Models: VW Golf, Jetta, New Beetle  
Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
RC_YA1.8336_01_99	Addition of Audi TT Quattro	5/10/1999
RC-YA1.8336_02_99	Addition of several carlines and engine codes	10/12/1999
FF_YA1.8336_03_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 12/24/2009 12:53:43 AM  
**Subject:** VW Group: MY 2001 Audi Field Fixes  
[CBI 1ADXV01.8336 APP F02 R00.PDF](#)  
[CBI 1ADXV01.8342 APP F03 R00.PDF](#)  
[CBI 1ADXV01.8346 APP F05 R00.PDF](#)  
[CBI 1ADXV01.8347 APP F01 R00.PDF](#)

Hello Jim,

Attached you will find four MY 2001 Audi ignition coil related field fixes. MY 2001 is too old to upload to the VERIFY System.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2001 Audi Test Group 1AD XV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE 41248 754 5000

Test Group ;	1AD XV01.8336
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_1A1.8336\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2000-2002

**Subject:**

Field Fix Nr.:	FF_YA1.8336_03_09	FF_1A1.8336_02_09
Model Year	2000	2001
Test Group:	YAD XV01.8336	1AD XV01.8336
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_2A1.8336_02_09
Model Year	2002
Test Group:	2AD XV01.8336
Models:	all
Transmission:	all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**

**Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2001  
Test Group: 1AD XV01.8336  
Evaporative Family: VW: 1AD XR0110234  
Audi: 1AD XR0130242  
Models: VW Golf, Jetta, New Beetle  
Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
RC_1A1.8336_02_09	Addition of Golf/GTI/Jetta	9/20/2000
FF_1A1.8336_02_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 21, 2009 Date

Subject: Field Fix for 2001 Audi Test Group 1AD XV01.8342

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	1AD XV01.8342
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_1A1.8342\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2001-2006

## Subject:

Field Fix Nr.:	FF_1A1.8342_03_09	FF_2A1.8342_19_09
Model Year	2001	2002
Test Group:	1ADXV01.8342	2ADXV01.8342
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_3A1.8342_11_09	FF_4A1.8342_08_09
Model Year	2003	2004
Test Group:	3ADXV01.8342	4ADXV01.8342
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_5A1.8342_05_09	FF_6A1.8342_02_09
Model Year	2005	2006
Test Group:	5ADXV01.8342	6ADXV01.8342
Models:	all	all
Transmission:	all	all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**  
**Emissions:** This change does not cause an impact on emissions.

AUDI AG  
12-21-2009



## Running Change / Field Fix Log

Model Year: 2001  
Test Group: 1AD XV01.8342  
Evaporative Family: 1AD XR0140232

Models: Audi A4, A4 quattro  
VW Passat

RC / FF Number	Description of Change / Reason	Date
RC_1A1.8342_01_00	New software calibration for increase to 170 H.P. and increased ETW to 3625 lbs. for new Passat facelift model.	Oct. 4, 2000
FF_1A1.8342_02_09	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part protection and an adjusted EVAP monitor below 40°F.	Feb. 24, 2009
FF_1A1.8342_03_09	Replacement Ignition Coils	December 2009

Prefix:

RC = Running Change  
RF = Running Change / Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2001 Audi Test Group 1AD XV01.8346

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	1AD XV01.8346
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_1A1.8346\_05\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2001-2006

**Subject:**

Field Fix Nr.:	FF_1A1.8346_05_09	FF_2A1.8346_09_09
Model Year	2001	2002
Test Group:	1AD XV01.8346	2AD XV01.8346
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_3A1.8346_09_09	FF_4A1.8346_04_09
Model Year	2003	2004
Test Group:	3AD XV01.8346	4AD XV01.8346
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_5A1.8346_01_09	FF_6A1.8346_01_09
Model Year	2005	2006
Test Group:	5AD XV01.8346	6AD XV01.8346
Models:	all	all
Transmission:	all	all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**  
**Emissions:** This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2001  
Test Group: 1AD XV01.8346  
Evaporative Family: VW: 1ADXR0110234  
Audi: 1ADXR0130242  
Models: VW Golf, Jetta, New Beetle  
Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
01	Addition of Audi TT and TT Roadster models, Addition of Evaporative Family 1ADXR0130242	August 15, 2000
FF01	Optimization of software calibration to prevent misfire during cold start.- Volkswagen Models	June 26, 2002
F04ECM_1-3mAD	ECM software change - misfire prevention	April 7, 2003
FF_1A1.8346_04_07	New ECM calibration. Adjusted Catalyst Monitor avoiding false MIL illumination. Adjusted Misfire Monitor to improve part protection.	August 2007
FF_1A1.8346_05_09	Replacement Ignition Coil	rolling December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2001 Audi Test Group 1AD XV01.8347

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	1AD XV01.8347
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_1A1.8347\_01\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

## Field Fix MY 2001-2002

**Subject:**

<b>Field Fix Nr.:</b>	FF_1A1.8347_01_09	FF_2A1.8347_01_09
<b>Model Year</b>	2001	2002
<b>Test Group:</b>	1ADXV01.8347	2ADXV01.8347
<b>Models:</b>	all	all
<b>Transmission:</b>	all	all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**

**Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2001  
Test Group: 1AD XV01.8347  
Evaporative Family: Audi: 1AD XR0130242

Models:  
Audi TT Quattro

RC / FF Number	Description of Change / Reason	Date
FF_1A1.8347_01_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 12/24/2009 12:53:51 AM  
**Subject:** VW Group: MY 2002 Audi Field Fixes  
[CBI 2ADXV01.8336 APP F02 R00.PDF](#)  
[CBI 2ADXV01.8342 APP F19 R00.PDF](#)  
[CBI 2ADXV01.8346 APP F09 R00.PDF](#)  
[CBI 2ADXV01.8347 APP F01 R00.PDF](#)  
[CBI 2ADXV03.0344 APP F03 R00.PDF](#)

Hello Jim,

Attached you will find five MY 2002 Audi ignition coil related field fixes. MY 2002 is too old to upload to the VERIFY System.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**





# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2002 Audi Test Group 2ADXV01.8336

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	2ADXV01.8336
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_2A1.8336\_02\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2000-2002

**Subject:**

Field Fix Nr.:	FF_YA1.8336_03_09	FF_1A1.8336_02_09
Model Year	2000	2001
Test Group:	YAD XV01.8336	1AD XV01.8336
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_2A1.8336_02_09
Model Year	2002
Test Group:	2AD XV01.8336
Models:	all
Transmission:	all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**

**Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2002  
Test Group: 2ADXV01.8336  
Evaporative Family: VW: 2ADXR0110234  
Audi: 2ADXR0130242  
Models: VW Golf, Jetta, New Beetle  
Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
RC_2A1.8336_01_02	The addition of ALMS model with 18 inch wheels and 225/40R18 tires. Increase of Equivalent Test Weight(ETW) of TT Roadster. The addition of 3.31 final drive	4/20/2002
FF_2A1.8336_02_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 21, 2009 Date

Subject: Field Fix for 2002 Audi Test Group 2AD XV01.8342

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	2AD XV01.8342
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_2A1.8342\_19\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2001-2006

## Subject:

Field Fix Nr.:	FF_1A1.8342_03_09	FF_2A1.8342_19_09
Model Year	2001	2002
Test Group:	1AD XV01.8342	2AD XV01.8342
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_3A1.8342_11_09	FF_4A1.8342_08_09
Model Year	2003	2004
Test Group:	3AD XV01.8342	4AD XV01.8342
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_5A1.8342_05_09	FF_6A1.8342_02_09
Model Year	2005	2006
Test Group:	5AD XV01.8342	6AD XV01.8342
Models:	all	all
Transmission:	all	all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**  
**Emissions:** This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2002  
 Test Group: 2ADXV01.8342  
 Evaporative Family: 2ADXR0140262  
 2ADXR0140232

Models: Audi A4, A4 Cabriolet, A4 quattro, A4 Avant, A4 Avant quattro  
 VW Passat / Passat Wagon

RC / FF Number	Description of Change / Reason	Date
RC_2A1.8342_02_01	Addition of the new 6 <sup>th</sup> generation A4	04/17/01
RC_2A1.8342_03_01	Addition of A4, A4 quattro models	06/12/01
RC_2A1.8342_04_01	Testing of the automatic in Sport and Tiptronic modes.	10/22/01
RC_2A1.8342_05_01	Addition of A4 Avant quattro model	12/21/01
RF_2A1.8342_06_02	Misfire during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	06/11/02
RF_2A1.8342_07_02	Calibration revision to prevent misfire after cold starts	06/11/02
FF_2A1.8342_08_03	New TCM software level to improve shift quality	02/04/03
FF_2A1.8342_09_03	New ECM software level to unify P codes for knock sensor	02/05/03
FF_2A1.8342_10_03	New ECM software to unify ECM to cover both automatic and manual trans.	02/05/03
FF_2A1.8342_11_03	Rough idle and MIL on during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	02/07/03
FF_2A1.8342_12_03	Rough idle and MIL on during 1 <sup>st</sup> 1000 revolutions after cold start related to fuel quality	02/13/03
FF_2A1.8342_13_03	New ECM software level to modify characteristics for engine speed limiter	02/18/03
FF_2A1.8342_01_06	New ECM software level turns off EVAP check below 4°C	10/31/06
FF_2A1.8342_14_06	Introduction of new EVAP purge flow valve	11/07/06
FF_2A1.8342_15_07	New ECM software level to enhance system strategies for misfire detection, throttle contamination, catalyst diagnosis and EVAP system test as low ambient temps.	02/15/07
FF_2A1.8342_16_07	New ECM software to correct premature MIL on for catalyst efficiency fault.	03/13/07
FF_2A1.8342_17_07	New ECM software level to improve cold start behavior and the EVAP Purge Valve	03/14/07
FF_2A1.8342_18_09	New software calibration with and improved catalyst monitor calibration, an adjustment to diagnostic strategy air intake volume/time, an adjusted misfire monitor for part protection and an adjusted EVAP monitor below 40°F.	Feb. 24, 2009
FF_2A1.8342_19_09	Replacement Ignition Coil	December 2009

Prefix:

RC = Running Change

RF = Running Change / Field Fix

FF = Field Fix



# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2002 Audi Test Group 2AD XV01.8346

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE 41248 754 5000

Test Group ;	2AD XV01.8346
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_2A1.8346\_09\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2001-2006

## Subject:

Field Fix Nr.:	FF_1A1.8346_05_09	FF_2A1.8346_09_09
Model Year	2001	2002
Test Group:	1ADXV01.8346	2ADXV01.8346
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_3A1.8346_09_09	FF_4A1.8346_04_09
Model Year	2003	2004
Test Group:	3ADXV01.8346	4ADXV01.8346
Models:	all	all
Transmission:	all	all

Field Fix Nr.:	FF_5A1.8346_01_09	FF_6A1.8346_01_09
Model Year	2005	2006
Test Group:	5ADXV01.8346	6ADXV01.8346
Models:	all	all
Transmission:	all	all

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**  
**Emissions:** This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2002  
Test Group: 2AD XV01.8346

Evaporative Family: VW: 2ADXR0110234  
Audi: 2ADXR0130242

Models: VW GTI, Golf, Jetta, Jetta Wagon, New Beetle  
Audi TT, TT Roadster

RC / FF Number	Description of Change / Reason	Date
RC_2A1.8246_02_01	Horsepower increase and addition of new 5 speed automatic transmission to the Golf/Jetta	March 2001
RC_2A1.8346_03_01 (2346/01)	Horsepower increase and the addition of a 6 speed manual transmission to the New Beetle	December 21, 2001
RF_2A1.0346_04_02 (2346/03)	Revision of the fuel system calibration to prevent misfire after cold starts.	June 24, 2002
FF_2A1.8346_06_03 (F04ECM_1-3mAD)	New ECM calibration to prevent misfire in the first 1000 revolutions under certain conditions	April 7, 2003
FF_2A1.8346_07_06 (2-346/01/06)	EVAP leak monitor enabled above 5°C intake air temperature only.	May 2006 rolling
FF_2A1.8346_08_07	New software calibration to adjust the Catalyst Monitor to avoid false MIL illumination and adjust the Misfire Monitor to improve part protection based on newer model year experience.	August 2007 rolling
FF_2A1.8346_09_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2002 Audi Test Group 2ADXV01.8347

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	2ADXV01.8347
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_2A1.8347\_01\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

## **Field Fix MY 2001-2002**

**Subject:**

<b>Field Fix Nr.:</b>	FF_1A1.8347_01_09	FF_2A1.8347_01_09
<b>Model Year</b>	2001	2002
<b>Test Group:</b>	1ADXV01.8347	2ADXV01.8347
<b>Models:</b>	all	all
<b>Transmission:</b>	all	all

**Event:**

Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:**

DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:**

A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Vehicle Type	Part number new	Release Date
all	06A 905 115 D	Nov-09

**Impact on**

**Emissions:**

This change does not cause an impact on emissions.

AUDI AG  
12-21-2009

## Running Change / Field Fix Log

Model Year: 2002  
Test Group: 2AD XV01.8347  
Evaporative Family: Audi: 2AD XR0130242

Models:  
Audi TT Quattro

RC / FF Number	Description of Change / Reason	Date
FF_2A1.8347_01_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

**Ex. 7**

Name  
Title  
Department  
Phone  
Fax  
E-Mail

December 22, 2009 Date

Subject: Field Fix for MY 2002 Audi Test Group 2AD XV03.0344

Dear Mr. Snyder,

With this letter we wish to inform the agency of a Field Fix for the following test group:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Test Group ;	2AD XV03.0344
Models	All
Transmission	All

The enclosed pages describe Field Fix FF\_2A3.0344\_03\_09 which introduces new replacement ignition coil.

If you have any questions with regard to this information please contact our office in Auburn Hills at **Ex. 7**

Sincerely,

**Ex. 7**

Enclosure(s)

# Field Fix MY 2002-2004

**Subject:**

Field Fix Nr.:	FF_2A3.0344_03_09	FF_3A3.0344_02_09
Model Year	2002	2003
Test Group:	2AD XV03.0344	3AD XV03.0344
Models:	all	all
Transmission:	all	all
Field Fix Nr.:	FF_4A3.0344_01_09	
Model Year	2004	
Test Group:	4AD XV03.0344	
Models:	all	
Transmission:	all	

**Event:** Customer complaint: MIL is flashing or constantly illuminated.

**Analysis:** DTCs for misfire in one or more cylinders are stored in the ECM.  
The misfire condition can be caused by an inoperative ignition coil.

**Activities:** A new generation of ignition coils is being installed in production.  
The improved ignition coil will be used in the workshop to satisfy customer.

Model	Partnumber new	Release Date
all	06C 905 115 M	Nov-09

**Impact on Emissions:** This change does not cause an impact on emissions.

AUDI AG  
12-21-2009



## Running Change / Field Fix Log

Model Year: 2002  
Test Group: 2ADXV03.0344  
Evaporative Family: Audi: 2ADXR0140232  
2ADXR0140233  
2ADXR0140262  
Models: A4, A4 Quattro, A6, A6 Quattro

RC / FF Number	Description of Change / Reason	Date
RC_2A3.0344_01_01	Addition of Audi A4 Avant quattro model	11/01/2001
FF_2A3.0344_02_02	The revision of the OBD system calibration to reduce false Malfunction Indicator Light (MIL) illumination. The diagnosis threshold has been changed in the Engine control Modules (ECM).	5/31/2002
FF_2A3.0344_03_09	Replacement Ignition Coil	December 2009

Prefixes:  
RC = Running Change  
RF = Running Change/Field Fix  
FF = Field Fix

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 1/26/2010 8:15:32 PM  
**Subject:** VW Meeting - January 27, 2010  
Microsoft PowerPoint - EPA agenda presentation Jan 2010 part1.pdf

Hello Jim:

I have attached a copy of slides for our meeting tomorrow. The slides through 9 cover the first agenda point, Audi Q5 Hybrid, and slides 10 and 11 are placeholders for the second and third agenda items. We will send additional slides in the morning.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 1/27/2010 3:40:05 PM  
**Subject:** RE: VW Meeting - January 27, 2010  
Microsoft PowerPoint - EPA agenda presentation Jan 2010 part2.pdf

Hello Jim:

As mentioned yesterday, I am now providing the Part 2 of the presentation for our meeting today.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**From:** Ex. 7  
**Sent:** Tuesday, January 26, 2010 3:16 PM  
**To:** 'Jim Snyder/AA/USEPA/US'  
**Subject:** VW Meeting - January 27, 2010

Hello Jim:

I have attached a copy of slides for our meeting tomorrow. The slides through 9 cover the first agenda point, Audi Q5 Hybrid, and slides 10 and 11 are placeholders for the second and third agenda items. We will send additional slides in the morning.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Suanne"  
**Sent:** Mon 2/1/2010 7:11:09 PM  
**Subject:** VW: AECD Submission V6 diesel 3.0L Test Group  
[ARB 01Feb2010 AECD EPA.pdf](#)  
[CBI BADXT03.03UG RFA AECD .PDF](#)  
[suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

Suanne Thomas

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4206  
Cell: (248) 797-4074  
FAX: (248) 754-4207  
E-Mail: [suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; Kata, Leonard" [Leonard.Kata@vw.com]  
**From:** "Reineke, Dennis"  
**Sent:** Wed 2/3/2010 9:19:28 PM  
**Subject:** Audi Durability Grouping

Hello Jim,

In response to our recent phone discussion about Durability Grouping the information below describes Audi's request to group vehicles in a durability group that would normally not be eligible to be in a single durability group.

Audi intends to use one catalyst to meet both U.S. and new European (EU5) emission requirements in select models. Currently we are making two requests. The first is for the 2011 MY Audi S5. The second is for the Audi R8 4.2. Listed below are the details of the catalysts Audi would like to group together in the same durability and test groups.

1) The Audi S5 with 4.2 liter V8 engine.

The Audi S5 will use a catalyst with a higher precious metal loading rate. This change will occur as part of the carryover of the 50-State certified Audi S5 models. All vehicles in the durability group/test group will be built with the new catalyst. Engine calibration, catalyst size, catalyst location and catalyst precious metal composition are all unchanged. The only difference compared to previous model years is the increased precious metal loading rate.

Development testing shows a reduction of approximately 10% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends to include this vehicle/catalyst in carryover durability group BADXGPGNN365 / Test Group BADXV04.2365. Durability factors from the 2008-10 MY carryover durability vehicle would be used to support 2011 MY certification. (A new durability vehicle would not be required.)

Durability Group: BADXGPGNN365  
Test Group: BADXV04.2365

Audi S5 4.2  
MY 08/09/10 MY11  
Emission Standard LEV II  
Type of Coating REX 1662 REX 2073  
Precious metal load rate 80 g/ft3 120 g/ft3  
PM (Pt: Pd: Rh) 0: 11: 1  
Supplier BASF

2) The Audi R8 4.2

The Audi R8 4.2 will use catalysts with a revised Precious Metal (PM) composition for both the pre-catalyst and main catalyst as well as an increase in the Cells/Inch<sup>2</sup>. The loading rate is unchanged however the surface area in the precat is increased due to the 33% increase in the number of Cells/inch<sup>2</sup>. The change will occur as part of the carryover of the 50-State certified Audi R8 4.2 models. All vehicles in

the durability group/test group will be built with the new catalyst. PM loading rate, catalyst size and catalyst locations are all unchanged. The only differences compared to previous model years are the increased cell count and the PM composition..

Development testing shows a reduction of approximately 10% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends to include this vehicle/catalyst in carryover durability group BADXGPGNN375 / Test Group BADXV04.2375. Durability factors from the 2008-10 MY carryover durability vehicle would be used to support 2011 MY certification. (A new durability vehicle would not be required.)

Durability Group: BADXGPGNN375  
Test Group: BADXV04.2375

Audi R8 4.2  
MY 08/09/10 MY11  
Pre Emission Standard LEV II  
Catalyst Type of Coating LEX 1365 M30 REX 2073  
Precious metal load rate 150 g/ft3 150 g/ft3  
PM (Pt: Pd: Rh) 1: 19: 1 0: 20: 1  
Cell Density – cells/inch2 400 600  
Foil Thickness 0.050 mm. 0.030 mm.  
Supplier BASF

Main Emission Standard LEV II  
Catalyst Type of Coating LEX 120 REX 2073  
Precious metal load rate 100 g/ft3 100 g/ft3  
PM (Pt: Pd: Rh) 1: 19: 1 0: 20: 1  
Cell Density – cells/inch2 300 300  
Cell Wall Thickness 0.050 mm. 0.050 mm.  
Supplier BASF

We believe this approach is allowed under 86.1820-01(e)

Please review and contact me with any questions.

Thank you,

Dennis E. Reineke  
Certification Specialist  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
USA  
Phone: +1-248-754-4215  
Fax : +1-248-754-4207  
Mail To: Dennis.Reineke@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Suanne"  
**Sent:** Tue 2/16/2010 6:05:21 PM  
**Subject:** RE: VW: AECD Submission V6 diesel 3.0L Test Group  
[suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)

Hi Jim: just checking if you have any comments/feedback for us.

Take care, Suanne

From: Thomas, Suanne  
Sent: Monday, February 01, 2010 2:11 PM  
To: 'snyder.jim@epa.gov'  
Subject: VW: AECD Submission V6 diesel 3.0L Test Group

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

Suanne Thomas

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4206  
Cell: (248) 797-4074  
FAX: (248) 754-4207  
E-Mail: [suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 3/2/2010 5:04:38 PM  
**Subject:** RE: VW/Audi Meeting

Hi Jim:

Thanks for scheduling the meeting. I am working with my colleagues in Germany to get more details. I hope to have additional information this week.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Monday, February 22, 2010 3:45 PM  
**To:** Ex. 7  
**Subject:** Re: VW/Audi Meeting

Hi Ex. 7 I scheduled a meeting so we have a room reserved. Can you give me some specifics? Is it more certification type questions, confirmatory data or testing issues?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Ex. 7  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/17/2010 06:24 PM  
**Subject:** VW/Audi Meeting

Hello Jim:

I guess that my colleagues from Germany have some additional questions regarding certification of EVs, FCEVs, PHEV etc. They will be in the Detroit area in mid-March. Is it possible to schedule a meeting for the morning of March 18, 2010? This would be in addition to the meeting that we have scheduled for March 4, 2010.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: Ex. 7

**Ex. 7**

From: Ex. 7

Sent: Wed 3/10/2010 1:43:52 PM

Subject: RE: VW/Audi Meeting

Agenda EPA Cert.pdf

Hello Jim:

I have your invitation for the meeting that we requested on my calendar for March 18, 2010 at EPA Ann Arbor (09:30 – 11:00). I have also received the attached draft agenda. If there are any related topics that you wish to discuss, please feel free to add to the agenda.

At this point, I expect 4 or 5 people from the VW Group. I will bring a laptop and projector.

Best regards,

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, February 22, 2010 3:45 PM

To: Ex. 7

Subject: Re: VW/Audi Meeting

Hi Ex. 7, I scheduled a meeting so we have a room reserved. Can you give me some specifics? Is it more certification type questions, confirmatory data or testing issues?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

02/17/2010 06:24 PM

Subject:

VW/Audi Meeting

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Thomas, Suanne" [Suanne.Thomas@vw.com]; Thomas, Suanne" [Suanne.Thomas@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 3/10/2010 6:10:46 PM  
**Subject:** Request for Federal OBD Approval for MY 2011 Volkswagen Test Group BVWXV02.5U35  
[CBI\\_BVWXV02.5U35\\_RFA\\_OBD\\_R00.PDF](#)

Hello Robert,

I am sending this e-mail as a "heads-up" for a request for Federal OBD approval for model year 2011 Volkswagen test group BVWXV02.5U35 that I just submitted through the Verify System. I have attached a copy of the submitted file for your convenience. Approval is requested by CW 16/10 (week of Monday, Apr. 19, 2010).

If you have any questions regarding this request, please contact me as indicated below.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

## OBD Description Submission

As indicated by meeting between EPA / Volkswagen and a letter to EPA Volkswagen is requesting MY11 OBD approval for the following OBD group / test group:

<b>OBD Group</b>	BVW-I5
<b>Test group(s)</b>	BVWXV02.5U35 (Jetta, Jetta Sportwagen, Golf)
<b>Engine Code(s)</b>	CBTA
<b>MY</b>	2011
<b>Standard</b>	Tier2 Bin 5 (Federal only)
<b>Transmission Group</b>	BVW-AIS (Aisin) carry over from MY10
<b>Application submission</b>	New for MY11
<b>Summary table</b>	Based on MY 08 ARB approved OBD system (please see submitted file)
<b>Emission Control System</b>	<b>SFI/TWC/HO2S(2)</b>
<b>ARB OBD Approval</b>	Approval letter MY 2008 is attached for reference
<b>Test Group in MY 2008</b>	8VWXV02.5253
<b>Federal OBD</b>	OBD System for this test group complies with CFR §86.1806-01, §86.06-04 and §86.06-05 for light duty vehicle with gasoline engine
<b>Concept Differences in comparison to MY 2008 ARB system approval</b>	OBD threshold application based on Tier 2 Bin5 NMHC correlated catalyst monitor EVAP leak detection based on 1.0mm orifice No IUMPR support <b>No Secondary Air System</b>
<b>Deficiency MY08</b>	None
<b>Concern MY08</b>	RO2 sensor, purge valve monitoring, fuel system monitoring, VVT monitoring (E05-188 and E06-019) MAP Sensor Monitor (E-06-078) Concerns are addressed during certification preview meeting and separate submittals.
<b>OBD Approval request</b>	Calendar Week 16 / 2010





Linda S. Adams  
Secretary for  
Environmental Protection

## Air Resources Board

Robert F. Sawyer, Ph.D., Chair  
9480 Telstar Avenue, Suite 4  
El Monte, California 91731 [www.arb.ca.gov](http://www.arb.ca.gov)



Arnold Schwarzenegger  
Governor

June 1, 2007

Reference No. E-07-109

Mr. Norbert Krause, Manager  
Volkswagen of America, Inc.  
Mail Code EEO  
3800 Hamlin Road  
Auburn Hills, MI 48326

Post-it <sup>®</sup> Fax Note	7671	Date	# of pages ▶
To	Bob Hart	From	Peter Ho
Co./Dept.	VW	Co.	ARB
Phone #		Phone #	(826) 459-4392
Fax #	(248) 754-4207	Fax #	

**SUBJECT:** Approval of Volkswagen's (VW) On-Board Diagnostics II (OBD II) System Design for 2007 Model Year Test Groups 8VWXV02.5257 and 8VWXV02.5253.

Dear Mr. Krause:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system descriptions submitted by VW for the 2008 model year test groups listed above. Representations made in the application indicate that the systems are compliant with the OBD II regulation. Therefore, ARB approves the 2008 model year systems with no deficiencies. However, the staff does have concerns regarding rear oxygen sensor monitoring, and manifold absolute pressure (MAP) sensor monitoring which were discussed in previous ARB approval letters (Reference No. E-05-188 and E-06-078). Staff understands VW is working to address the rear oxygen sensor monitoring and MAP sensor monitoring concerns. The staff also has concerns regarding front oxygen sensor monitoring as discussed below.

VW's current front oxygen sensor response monitor compares the actual sensor signal to a modeled "threshold" sensor signal. The monitor evaluates the sensor signal over 12 cycles (i.e., lambda modulation and corresponding switches of the sensor from lean to rich and back to lean). VW representatives have explained that the sensor cycle time is a function of both sensor deterioration and catalyst aging and typical cycle time ranges from 1 to 10 seconds which would yield a worst case monitoring time of 120 seconds. While VW representatives believe that this monitoring time is reasonable and will occur in-use, staff is concerned that, as the oxygen sensor malfunctions and progressively deteriorates, the cycle time could be significantly longer and consequently the time required to collect 12 cycles of the sensor signal would affect monitoring frequency and hinder detection of malfunctions in-use. This concern also applies to other test groups that require a specified number of cycles for the oxygen sensor

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California Environmental Protection Agency

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Mr. Krause  
June 1, 2007  
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monitor (e.g., test group 8AD XV05.2385 requires 40 cycles). Staff believes a secondary measure (e.g., the monitor would detect a malfunction if 12 cycles have not been achieved in 120 seconds of monitoring time) is necessary to account for long cycle times and ensure detection of sensor malfunctions that result in longer cycle times. In order to avoid a deficiency determination on future model year vehicles, VW is required to investigate improvements to this monitoring strategy and propose an implementation schedule for staff approval.

Should you have questions or comments regarding this letter, please have your staff contact Mr. Peter Ho at (626) 459-4392.

Sincerely,

Handwritten signature of Michael J. Regal for SGA.

Steve Albu, Assistant Chief  
Mobile Source Control Division

cc: Mr. Peter Ho  
Engineering Evaluation Section

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Catalyst System	P0420	measure of OSC compared to OSC of borderline catalyst	<u>measured OSC / OSC of borderline catalyst</u> measured OSC (HC and NOx-correlated)	< 1.00 [-]	time after dew point delta exhaust mass flow exhaust gas mass flow, lower range exhaust gas mass flow, upper range modeled exhaust gas temp, dynamic modeled exhaust gas temp, upper range modeled exhaust gas temp, in catalyst system, lower range modeled exhaust gas temp, in catalyst system, upper range minimum modeled exhaust gas temp, in catalyst system for time filtered minimum modeled exhaust gas temp, in catalyst system engine load evap purge loading engine speed range between lambda set value and lambda value out of lambda range lambda control lambda control number of checks Q2S front Q2S rear SAS no misfire Q2S front response monitoring in current driving cycle	> 5.0 [s] < 25.00 [kg/h] 30.00...120.00 [kg/h] 150.00 [kg/h] < 50 [K] 560...860 [°C] 1000 [°C] > 400 [°C] > 120.0 [s] > 450 [°C] 14.30...65.30 [%] not high 1200...3320 [rpm] <   0.05   [-] < 1 [s] closed loop not at min or max limit 3.00 [-] ready ready not active ready	25.0 [s] once / DCY	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Misfire	P0300	crankshaft speed fluctuation (single or multiple)	emission threshold misfire rate (MR)	> 3 [%]	active after engine start	idle - 150 [rpm] + 1 camshaft [rev] 500...6250 [rpm]	1000 [rev] continuous	2 DCY
	P0301		catalyst damage misfire rate (MR)	> 2.5...24 [%]	engine speed range	>= 0 [Nm] > -48 [°C] > -48 [°C] not active not detected	200 [rev] continuous	immediately
	P0302				engine torque			
	P0304 P0305 P0303				IAT ECT @ start fuel cut off rough road			
EVAP Purge Valve	P0444	open circuit	signal voltage	4.70...5.40 [V]	evap purge valve	commanded off	0.5 [s] continuous	2 DCY
	P0458	short to ground	signal voltage	0.0...3.26 [V]	engine speed evap purge valve	> 80 [rpm] commanded off	0.5 [s] continuous	2 DCY
	P0459	short to battery plus	signal current	> 2.20 [A]	engine speed evap purge valve	> 80 [rpm] commanded on	0.5 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Purge Valve	P0441	functional check stuck open	actual evap pump current difference between reference measurement to idle divided by pump current difference from the last leak detection phase during engine off	> 1.70 [-]	ECT @ start ambient air temperature altitude time since engine start integrated evap purge flow since last purge stop integrated evap purge flow since last monitoring run intake manifold vacuum vehicle speed delta vehicle speed fuel volume flow at least one leak detection monitor during engine off engine engine speed no fuel cut off no gear shift no engine stop O2S front evap purge valve	> 60 [°C]  < 60 [°C] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] > 2 [g]  > 0 [g]  > 100.00 [hPa] < 120; >= 0 [km/h] <= 30 [km/h] <= 5.00 [m/s] preceding  not idle > 20 [rpm]	4.5 [s] once / DCY	2 DCY
	P0441	functional check stuck close	drop of evap pump current within time	< 1 [mA]  12.0 [s]	ECT @ start ambient air temperature altitude time since engine start integrated evap purge flow since last purge stop integrated evap purge flow since last monitoring run intake manifold vacuum vehicle speed delta vehicle speed fuel volume flow at least one leak detection monitor during engine off increase of evap pump current from idle state within time engine engine speed no fuel cut off no gear shift no engine stop O2S front evap purge valve	> 60 [°C]  < 60 [°C] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] > 2 [g]  > 0 [g]  > 100.00 [hPa] < 120; >= 0 [km/h] <= 30 [km/h] <= 5.00 [m/s] preceding  >= 0.3 [mA]  < 17 [s] not idle > 20 [rpm]  ready commanded on	33.5 [s] once / DCY	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP System Small Leak	P0442	pressure check	modeled pressure from pump current	< 9.00 [hPa]	engine temperature @ engine start difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding day change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation no sudden change in evap pump current (filling event) deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL illumination because of any EVAP leakage the monitor is only activated every)	>= 4 [°C] <= 15 [K] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] < 1.00 [V] >= 5.0 [s] 0 [km/h] < 5.00 [-] < 2; > -1 [mA] <= 1 [mA] n.a. n.a. < 900.0 [s] not activated 1 days	4000.0 [s] once / DCY	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Leak Detection Pump	P043E	out of range high during engine off	evap pump current during reference measurement	> 40 [mA]	engine temperature @ engine start difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding dcyl change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL illumination because of any EVAP leakage the monitor is only activated every)	>= 4 [°C]  ≤ 15 [K]  < 35; > 4 [°C] ≤ 2700 [m] >= 600.0 [s]  < 1.00 [V]  >= 5.0 [s] 0 [km/h] < 5.00 [-] ≤ 1 [mA]	10.0 [s] once / DCY	2 DCY
	P043F	out of range low during engine off	evap pump current during reference measurement	< 15 [mA]	difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding dcyl change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL illumination because of any EVAP leakage the monitor is only activated every)	>= 4 [°C]  ≤ 15 [K]  < 35; > 4 [°C] ≤ 2700 [m] >= 600.0 [s]  < 1.00 [V]  >= 5.0 [s] 0 [km/h] < 5.00 [-] ≤ 1 [mA]  n.a. n.a. < 900.0 [s] not activated 1 dcyl/s	10.0 [s] once / DCY	2 DCY

Component/ System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Leak Detection Pump	P2407	signal check during engine off	fluctuation of evap pump current during reference measurement or drop of evap pump current during pump phase for time	> 1 [mA]	engine temperature @ engine start	>= 4 [°C]	800.0 [s]	2 DCY
				> 6 [mA] >= 3.0 [s]	difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding dcyl change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL illumination because of any EVAP leakage the monitor is only activated every)	<= 15 [K] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] < 1.00 [V] >= 5.0 [s] 0 [km/h] < 5.00 [-] <= 1 [mA] n.a. n.a. < 900.0 [s] not activated 1 dcyl/s	once / DCY	



Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
	P2450	rationality check during engine off	evap pump current difference between reference measurement to idle	<= 3 [mA]	engine temperature @ engine start difference between ECT and IAT @ engine start ambient air temperature altitude time since engine start in preceding dcyl change in battery voltage during monitoring engine off time vehicle speed evap purge adaptation no sudden change in evap pump current (filling event) deviation of filtered evap pump current during reference measurement within range change in relative evap pump current during monitoring within time (during ECM keep alive-time after ignition off, max. time) airbag (after MIL illumination because of any EVAP leakage the monitor is only activated every)	>= 4 [°C] <= 15 [K] < 35; > 4 [°C] <= 2700 [m] >= 600.0 [s] < 1.00 [V] >= 5.0 [s] 0 [km/h] < 5.00 [-] < 2; > -1 [mA] <= 1 [mA] n.a. < 900.0 [s] n.a. not activated 1 dcyls	13.5 [s] once / DCY	2 DCY
EVAP Leak Detection Pump	P0448	short to battery plus	signal current	> 2.2...4.0 [A]	evap pump solenoid valve	commanded on	0.5 [s] continuous	2 DCY
	P0448	short to ground	signal voltage	< 2.74...3.26 [V]	evap pump solenoid valve	commanded off	0.5 [s] continuous	2 DCY
	P0447	open circuit	signal voltage	> 4.7...5.4 [V]	evap pump solenoid valve	commanded off	0.5 [s] continuous	2 DCY
EVAP Leak Detection Pump	P2402	short to battery plus	short circuit signal voltage at evap pump current measuring resistor	> 4.00 [V]	evap pump electric drive	commanded on	0.5 [s] continuous	2 DCY
	P2401	short to ground	pump stuck signal voltage at evap pump current measuring resistor	> 1.80 [V]	evap pump electric drive	commanded off	0.5 [s] continuous	2 DCY
	P2400	open circuit	signal voltage	> 4.7...5.4 [V]	evap pump electric drive	commanded off	0.5 [s] continuous	2 DCY

Component/ System	Fault Code	Monitor/Strategy Description	Malfunction Criteria	Threshold Value	Secondary/Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
EVAP Leak Detection Pump	P240C	short to battery plus	signal current	> 2.2...4.0 [A]	evap pump heater	commanded on	0.5 [s] continuous	2 DCY
	P240B	short to ground	signal voltage	< 2.74...3.26 [V]	evap pump heater	commanded off	0.5 [s] continuous	2 DCY
	P240A	open circuit	signal voltage	> 4.7...5.4 [V]	evap pump heater	commanded off	0.5 [s] continuous	2 DCY
Fuel System	P2096	out of range	11-portion of 2nd lambda control loop	< -0.040 [-]	modeled exhaust gas temp. exhaust gas mass flow lambda control lambda control	400...1000 [°C] 18.00...180.00 [kg/h] closed loop not at min or max limit	30.0 [s] continuous	2 DCY
	P2097	out of range	11-portion of 2nd lambda control loop	> 0.040 [-]	modeled exhaust gas temp. exhaust gas mass flow lambda control lambda control 2nd lambda control O2S front O2S rear O2S heater front O2S heater rear fuel cut off catalyst heating SAI	400...1000 [°C] 18.00...180.00 [kg/h] closed loop not at min or max limit closed loop ready ready active active active not active not active not active	30.0 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Fuel System	P2187	system too lean @ idle	adaptive value	> 5.02 [%]	number of injections after engine start engine speed mass air flow ECT IAT ratio manifold pressure to ambient pressure or valve overlap delta part load adaptation lambda control evap purge valve	> 1500 [-] < 860 [rpm] < 35 [kg/h] > 59 [°C] < 85 [°C] > 0.20 [-] < 40.00 [°CRK] ready closed loop closed	40.0 [s] continuous	2 DCY
	P2188	system too rich @ idle	adaptive value	< -5.02 [%]	number of injections after engine start engine speed mass air flow ECT IAT ratio manifold pressure to ambient pressure or valve overlap delta part load adaptation lambda control evap purge valve	> 1500 [-] < 860 [rpm] < 35 [kg/h] > 59 [°C] < 85 [°C] > 0.20 [-] < 40.00 [°CRK] ready closed loop closed	40.0 [s] continuous	2 DCY
	P2177	system too lean @ part load	adaptive value	> 28 [%]	number of injections after engine start engine speed engine load mass air flow ECT IAT ratio manifold pressure to ambient pressure or valve overlap lambda control evap purge valve	> 1500 [-] 1320...4600 [rpm] 25...100 [%] 45...300 [kg/h] > 59 [°C] < 85 [°C] > 0.20 [-] < 40.00 [°CRK] closed loop closed	25.0 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
	P2178	system too rich @ part load	adaptive value	< -20 [%]	number of injections after engine start engine speed engine load mass air flow ECT IAT ratio manifold pressure to ambient pressure or valve overlap lambda control evap purge valve	> 1500 [-] 1320...4600 [rpm] 25...100 [%] 45...300 [kg/h] > 59 [°C] < 85 [°C] > 0.20 [-] < 40.00 [°CRK] closed loop closed	25.0 [s] continuous	2 DCY
Leak to Intake Manifold	P2279	adaptation value monitoring	offset value throttle mass flow	> 13.00 [kg/h]	desired mass flow evap purge valve EGR	0.00...25.00 [kg/h] closed off	10.0 [s] multiple	2 DCY
Oxygen Sensors front	P214	signal range check (check for sensor at ambient air)	threshold 1: signal voltage threshold 2: signal voltage Depending on gain factor, that actual is used for sensor	3.10...4.77 [V] 2.50...3.06 [V]	lambda set value O2S ceramic temp. fuel cut off heater control SAI if low fuel signal then wait	< 1.6 [-] > 715 [°C] not active closed loop not active > 0.0 [s]	15.0 [s] multiple	2 DCY

Component/ System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors front	P2195	out of range	delta lambda of 2nd lambda control loop	> 0.065 [-]	modeled exhaust gas temp.  delta engine load exhaust gas mass flow lambda control 2nd lambda control O2S front O2S rear O2S heater front O2S heater rear fuel cut off catalyst heating SAI <b>Case 1:</b> 1st lambda control loop  2nd lambda control loop <b>Case 2:</b> 1st lambda control loop O2S front O2S rear voltage <b>Case 3:</b> 1st lambda control loop O2S front	n.a. 18.00...180.00 [kg/h] closed loop closed loop ready ready ready ready ready ready not active not active not active  not at min or max limit active  at min limit < 1.0 [-] < 0.4 [V]  at max limit > 1.0 [-] > 0.6 [V]	30.0 [s] multiple	2 DCY
	P2196	out of range	delta lambda of 2nd lambda control loop	< -0.065 [-]	modeled exhaust gas temp.  delta engine load exhaust gas mass flow lambda control 2nd lambda control O2S front O2S rear O2S heater front O2S heater rear fuel cut off catalyst heating SAI <b>Case 1:</b> 1st lambda control loop  2nd lambda control loop <b>Case 2:</b> 1st lambda control loop O2S front O2S rear voltage <b>Case 3:</b> 1st lambda control loop O2S front	n.a. 18.00...180.00 [kg/h] closed loop closed loop ready ready ready ready ready ready not active not active not active  not at min or max limit active  at min limit < 1.0 [-] < 0.4 [V]  at max limit > 1.0 [-] > 0.6 [V]	30.0 [s] multiple	2 DCY

Component / System	Fault Code	Monitor/Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	Mile Illum.
Oxygen Sensors front	P0133	response rate monitoring, area ratio and gradient ratio	<b>SYMMETRIC FAULT:</b> difference of R2L area ratio vs. L2R area ratio lower value of both counters for area ratio R2L and L2R <b>Delay Time:</b> gradient ratio lower value of both area ratios R2L and L2R <b>Transient Time:</b> gradient ratio gradient ratio lower value of both area ratios R2L and L2R <b>or</b> lower value of both gradient ratios R2L and L2R <b>ASYMMETRIC FAULT:</b> difference of R2L area ratio vs. L2R area ratio values of both counters for area ratio R2L and L2R <b>Delay Time:</b> gradient ratio lower value of both area ratios R2L and L2R <b>Transient Time:</b> gradient ratio gradient ratio lower value of both area ratios R2L and L2R <b>or</b> lower value of both gradient ratios R2L and L2R	-1.00... 1.00 [-]  >= 4 times  >= 0.25 [-] < 0.25 [-]  < 0.25 [-]  < 0.25 [-]  < 0.25 [-]	O2S front - min. operation temperature is reached O2S front - time since operation readiness engine speed  engine load gradient of engine load exhaust system lag time calculation  gradient of exhaust system lag time calculation ECT catalyst temperature lambda control set-point prior to diagnostic fuel steps relative fuel amount from wall-applied compensation and evap purge time since last measurement  gear shifting evap purge  <b>or</b> evap purge 2nd lambda control loop forced lambda oscillation SAI tank leakage detection diagnosis evap purge system fuel cut off for any cylinders  open circuit pump current (IP) <b>only Flex fuel systems without ethanol sensor:</b> ethanol concentration adaptation	> 720 [°C]  > 40.0 [s]  1160...2720 [rpm]  13.99...70.01 [%] <= 4.99 [%] 0.1...0.5 [s]  <= 0.0 [s]  >= 62 [°C] >= 450 [°C] A/F-Ratio stoichiometric <= 0.1 [-]  > 3.0 [s]  n.a. not active  > 2.0 [s] not active not active not active not active not active not active not active ready not active	107.0 [s] once / DCY	2 DCY
Oxygen Sensors front	P0130	out of range	O2S ceramic temp.	< 640 [°C]	modeled exhaust gas temp. fuel cut off	> 300 [°C] not active	15.0 [s] multiple	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors front	P2251	open circuit virtual mass (VM)	O2S signal front and internal resistance	1.47...1.53 [V]  > 950 [Ohm]	modeled exhaust gas temp.  no fuel cut off heater control	< 750 [°C]  > 2.0 [s] active	30.5 [s] multiple	2 DCY
	P2243	open circuit nemst voltage (UN)	O2S signal front and internal resistance O2S signal front	> 4.70 [V]  > 950 [Ohm] < 0.20 [V]	heater control	active	25.5 [s] multiple	2 DCY
	P2626	open circuit adjustment voltage (IA)	and internal resistance O2S signal front	> 950 [Ohm]  > 4.77 [V]	modeled exhaust gas temp.	< 750 [°C]	2.0 [s] multiple	2 DCY
					O2S ceramic temp. fuel cut off heater control if low fuel signal then wait	> 720 [°C] active closed loop > 0.0 [s]		
	P2237	open circuit pump current (IP)	O2S signal front and delta lambda controller	1.49...1.51 [V]  >   0.10   [-]	O2S ceramic temp. lambda modulation lambda control heater control	> 720 [°C]  > 0.02 [-] closed loop closed loop	6.5 [s] multiple	2 DCY
	P0132	signal range check	short to battery virtual mass (VM)	> 3.25 [V]			5.0 [s] multiple	2 DCY
			or nemst voltage (UN) or adjustment voltage (IA) or adjustment voltage (IP)	> 4.40 [V]  > 7.00 [V]  > 7.00 [V]				
	P0131	signal range check	short to ground virtual mass (VM)	< 1.75 [V]			5.0 [s] multiple	2 DCY
			or nemst voltage (UN) or adjustment voltage (IA) or adjustment voltage (IP)	< 1.50 [V]  < 0.30 [V]  < 0.30 [V]				

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors rear 2-Point-LSF	P0137	O2S signal check - circuit continuity (short to ground, core connection signal wires)	signal voltage for time and difference of sensor voltage with load pulse and voltage without load pulse (mean value of 3 measurements)	< 0.06 [V] > 3.0 [s] < 0.01 [V]	<u>case 1: sensor ready for operation</u> sensor voltage or sensor voltage <u>case 2: sensor theoretical ready for operation</u> for time sensor sufficient heated up if exhaust temperature for time or heater power for time <u>general:</u> dew point exceeded fuel cut off catalyst purge	<= 0.40 [V] 0.50... 1.08 [V] > 12.0 [s] >= 1263 [°C] > 18.0 [s] >= 24 [%] > 18.0 [s]	3.0 [s] multiple	2 DCY
	P0138	O2S signal check - out of range high (short to battery plus)	signal voltage for time	> 1.08 [V] > 5.0 [s]	<u>case 1: sensor ready for operation</u> sensor voltage or sensor voltage <u>case 2: sensor theoretical ready for operation</u> for time sensor sufficient heated up if exhaust temperature for time or heater power for time <u>general:</u> dew point exceeded lambda set value	<= 0.40 [V] 0.50... 1.08 [V] > 12.0 [s] >= 1263 [°C] > 18.0 [s] >= 24 [%] > 18.0 [s] > 0.995 [-]	5.0 [s] multiple	2 DCY



Component / System	Fault Code	Monitor Strategy Description	Multifunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors rear 2-Point-LSF	P0140	O2S signal check - circuit continuity (sensor signal line open circuit)	signal voltage for time and difference of sensor voltage with load pulse and voltage without load pulse (mean value of 3 measurements)	0.40...0.60 [V]  > 3.0 [s]  >= 2.80 [V]	<u>case 1: sensor ready for operation</u> sensor voltage or sensor voltage <u>case 2: sensor theoretical ready for operation</u> for time sensor sufficient heated up if exhaust temperature for time or heater power for time <u>general:</u> dew point exceeded	  0.50...1.08 [V]  > 12.0 [s]  >= 1263 [°C] > 18.0 [s]  >= 24 [%] > 18.0 [s]	30.0 [s] multiple	2 DCY
	P0140	O2S signal check - circuit continuity (sensor ground line open circuit)	internal resistance and exhaust temperature	> 40000 [Ohm]  > 670 [°C]	<u>case 1: sensor ready for operation</u> sensor voltage or sensor voltage <u>case 2: sensor theoretical ready for operation</u> for time sensor sufficient heated up if exhaust temperature for time or heater power for time <u>general:</u> dew point exceeded valid RI-measurements	  0.50...1.08 [V]  > 12.0 [s]  >= 1263 [°C] > 18.0 [s]  >= 24 [%] > 18.0 [s]  > 10 times	30.0 [s] multiple	2 DCY
Oxygen Sensors rear 2-Point-LSF	P2270	stuck lean (if sensor stuck lean: enrichment)	O2S signal rear not oscillating at reference and enrichment after stuck lean	< 0.64...0.65 [V]  20 [%]	mass air flow  modeled exhaust gas temp. O2S rear readiness 2nd lambda control	22.00...120.00 [kg/h]  > 300 [°C] > 10.0 [s] closed loop	215.0 [s] once / DCY	2 DCY
	P2271	stuck rich (if sensor stuck rich: enrichment) if enrichment is not successful: waiting for next fuel cut off	O2S signal rear not oscillating at reference and enrichment after stuck rich	> 0.64...0.65 [V]  15 [%]	modeled exhaust gas temp. O2S rear readiness fuel cut off 2nd lambda control	22.00...120.00 [kg/h]  > 300 [°C] > 10.0 [s] > 3.0 [s] closed loop	215.0 [s] once / DCY	2 DCY

Component / System	Fault Code	Monitor / Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors Heater front	P0030	open circuit	heater voltage	4.70...5.40 [V]	time after engine start	> 5 [s]	0.5 [s] continuous	2 DCY
	P0031	short to ground	heater voltage	0.0...3.26 [V]	time after engine start	commanded off > 5 [s]	0.5 [s] continuous	2 DCY
	P0032	short to battery plus	signal current	> 5.50 [A]	time after engine start	commanded off > 5 [s]	0.5 [s] continuous	2 DCY
Oxygen Sensors Heater front	P0135	out of range high	O2S ceramic temp. and heater duty cycle	< 720 [°C] > 90.00 [%]	modeled exhaust gas temp. heater control	> 550 [°C] active	70.0 [s] multiple	2 DCY
	P0135	rationality check (sensor heating up)	O2S ceramic temp. and time after O2S heater on	< 715 [°C] 35.0 [s]	ECT @ start engine shut-off-time (during ECM keep alive-time after ignition off)	> -10 [°C] > 120.0 [s] < 500.0 [s]	35.0 [s] multiple	2 DCY
Oxygen Sensors Heater rear 2- Point-L-SF	P0141	out of range	heater resistance	> 1200...32400 [Ohm]	modeled exhaust gas temp.	300...680 [°C]	6.0 [s] multiple	2 DCY
Oxygen Sensors Heater rear 2- Point-L-SF	P0036	open circuit	heater voltage	2.34...3.59 [V]	engine speed	> 80 [rpm]	0.5 [s] continuous	2 DCY
	P0037	short to ground	heater voltage	< 2.34 [V]	engine speed	commanded off > 80 [rpm]	0.5 [s] continuous	2 DCY
	P0038	short to battery plus	heater voltage	> 3.59 [V]	engine speed	commanded off > 80 [rpm]	0.5 [s] continuous	2 DCY

OBd Summary Table MV 11  
Issue Date 03-09-2010 Engine Code CBTA  
OBd-Group BMW-I5 Test-Group BMWXV02.5U35 Revision Date

Component/ System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Oxygen Sensors rear (binary LSF)	P2271	check of response time at fuel cut off	sensor voltage of after oxygen mass flow (after fuel cut off) and number of checks	$\geq 0.15$ [V]  $> 2000...3500$ [mg]  $\geq 1.0$ [-]	time of fuel cut off  time after last fuel cut off O2S rear exhaust temperature at sensor deviation between expected and measured front O2-sensor lambda signal after time since fuel cut off at first cylinder oscillation check exhaust mass flow exhaust mass flow dynamic within range sensor voltage at start of measurement	$\leq 90.0$ [s]  $\geq 5.0$ [s] ready $\geq 430$ [°C] $< 8.00$ [-]  $\geq 2.0$ [s] ready $> 12.00$ [kg/h] $-500.00...500.00$ [kg/h]  $> 0.55$ [V]	10.0 [s] multiple	2 DCY
Cold Start Detection		detection by engine off timer	---		engine off time	$> 21600.0$ [s]	100.0 [s] once / DCY	2 DCY
Engine Coolant Temperature Sensor	P0118	short to battery / open circuit	ECT	$< -40$ [°C]			2.0 [s] multiple	2 DCY
	P0117	short to ground	ECT	$> 140$ [°C]			2.0 [s] multiple	2 DCY
	P0116	stuck high	no change on signal	<u>thres 01(ECT)1:</u> 2 [K]	ECT @ start ECT cold start  substitute ECT <u>driving condition L:</u> vehicle speed mass air flow time required / frequency  <u>driving condition H:</u> vehicle speed mass air flow time required / frequency	<u>temp 01</u> 50...141 [°C] 105...141 [°C] detected  <u>temp 02</u> $> -45$ [°C]  0...20 [km/h] 4.00...40.00 [kg/h] $> 10.0$ [s] 3 times  50...150 [km/h] 32.00...352.00 [kg/h] $> 40.0$ [s] once	70.0 [s] once / DCY	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Engine Coolant Temperature Sensor	P0116	stuck low	no change on signal	thres_01[ECT]: 2 [K]	ECT @ start ECT cold start  substitute ECT <b>driving condition L:</b> vehicle speed mass air flow time required / frequency <b>and</b> <b>driving condition H:</b> vehicle speed mass air flow time required / frequency	<u>temp_01</u> 50...141 [°C]  -42...75 [°C] detected  <u>temp_02</u> > -45 [°C]  0...20 [km/h] 4.00...40.00 [kg/h] > 10.0 [s] 3 times	70.0 [s] once / DCY	2 DCY
	P0116	stuck in range	signal in range <b>and</b> no change on signal	75...105 [°C] 2 [K]	stuck high ECT @ start  substitute ECT <b>driving condition L:</b> vehicle speed mass air flow time required / frequency <b>and</b> <b>driving condition H:</b> vehicle speed mass air flow time required / frequency	<u>temp_01</u> 50...141 [°C]  <u>temp_02</u> > -45 [°C]  0...20 [km/h] 4.00...40.00 [kg/h] > 10.0 [s] 3 times  50...150 [km/h] 32.00...352.00 [kg/h] > 40.0 [s] once	100.0 [s] once / DCY	2 DCY
Engine Coolant Temperature Sensor rationality	P3081	measured engine coolant temp. below reference model	diff. reference model temperature vs. ECT	> 11 [K]			4.0 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Coolant System Performance	P2181	cooling system performance not in a expect range	cooling system temperature to low after a sufficient air mass flow integral	thers_03: 75 [°C]	begin of air mass integration when engine temp. ECT @ start AAT fuel cut off and engine load	thers_01: 30 [°C]  thers_02: -10...60 [°C] -10 [°C] not active  airmass_01: 4...13.5 [kg/h]  120...180 [s]  4...12 [kg]  35...280 [kg/h] 30...120 [km/h]	200.0 [s] once / DCY	2 DCY
					integrated air mass depending on engine temp. at start and AAT depending on temp. at engine start and min. observed AAT for longer than depending on temp. at engine start and min. observed AAT for more than <b>at time of fault decision:</b> average air mass flow average vehicle speed			
Phase Sensor 1	P0343	rationality check	signal voltage	permanently high			0.5 [s] continuous	2 DCY
	P0342	rationality check	and crankshaft signals signal voltage	8 [-] permanently low			0.5 [s] continuous	2 DCY
	P0341	rationality check	and crankshaft signals signal pattern defect counter	8.00 [-] incorrect 8.00 [-]			0.5 [s] continuous	2 DCY
RPM Sensor	P0321	rationality check	counted teeth vs. reference	incorrect			1.5 [s] multiple	2 DCY
	P0322	signal activity check	or monitoring reference gap camshaft signals and engine speed	failure > 5.00 [-]  no signal			2.5 [s] multiple	2 DCY
Camshaft Position Sensor Inlet	P0016	angular offset check	permissible deviation or permissible deviation	< -13.49 [°CRK] > 13.49 [°CRK]			10 [rev] multiple	2 DCY

Component/ System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	Mile Illum.
VVT Actuator Intake	P0010	open circuit	signal voltage	4.70...5.40 [V]	camshaft valve	off	0.5 [s] continuous	2 DCY
	P2088	short to ground	signal voltage	0.0...3.25 [V]	engine speed camshaft valve	> 80 [rpm] off	0.5 [s] continuous	2 DCY
	P2089	short to battery plus	signal current	> 2.20 [A]	engine speed camshaft valve	> 80 [rpm] on	0.5 [s] continuous	2 DCY
VVT Actuator Intake	P000A	slow response	difference between target position vs. actual position for time and adjustment angle	>  8.00...12.00  [°CRK] > 1.8...2.5 [s] ≥  3.00  [°CRK]	time after engine start engine speed oil temperature frequency (normal operation)	> 1.5...10.0 [s] 600...6000 [rpm] -48...143 [°C] 7 times	21.0 [s] multiple	2 DCY
	P0011	target error	difference between target position for time vs. actual position and adjustment angle	>  8.00...12.00  [°CRK] > 1.8...2.5 [s] <  3.00  [°CRK]	time after engine start engine speed oil temperature frequency (normal operation)	> 1.5...10.0 [s] 600...6000 [rpm] -48...143 [°C] 7 times	21.0 [s] multiple	2 DCY
Altitude Sensor	P0606	plausibility check	signal gradient	> 50.00 [hPa]			2.0 [s] multiple	2 DCY
	P0606	plausibility check	signal gradient	< -50.00 [hPa]			2.0 [s] multiple	2 DCY
Altitude Sensor	P0606	short to battery / open circuit	signal voltage	> 4.88 [V]			0.2 [s] multiple	2 DCY
	P0606	short to ground	signal voltage	< 0.20 [V]			0.2 [s] multiple	2 DCY
Manifold Pressure Sensor	P0107	short to ground	signal voltage	< 0.20 [V]			1.0 [s] continuous	2 DCY
	P0108	short to battery / open circuit	signal voltage	> 4.86 [V]			1.0 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Manifold Pressure Sensor	P0106	rationality check low	difference manifold pressure - lower threshold model	< 0 [hPa]			2.5 [s] multiple	2 DCY
	P0106	rationality check high	model range difference manifold pressure - upper threshold model	45...845 [hPa] > 0 [hPa]			2.5 [s] multiple	2 DCY
	P0106	rationality check	model range diff. altitude sensor signal vs. manifold pressure signal at engine start	640...1055 [hPa] > 60.00 [hPa]	time after engine start engine speed	< 25.0 [s] < 330 [rpm]	2.5 [s] multiple	2 DCY
	P0106	adaptation value monitoring	offset value manifold pressure for load calculation in driving condition range 2	> 55.00 [hPa]	<u>driving condition range 1 (omsnal):</u> engine speed desired mass flow delta adaptation value range 1 for time <u>driving condition range 2 (opstra):</u> engine speed manifold pressure delta adaptation value range 2 for time <u>driving condition range 3 (opua):</u> desired mass flow manifold pressure delta adaptation value range 3 for time <u>General:</u> engine operation in every driving condition diagnosis evap purge system engine speed manifold pressure ratio manifold pressure to ambient pressure	< 800 [rpm] 5.00...25.00 [kg/h] < 0.10 [kg/h] 1.0 [s] > 1400 [rpm] < 425.00 [hPa] < 2.97 [hPa] 8.0 [s] > 40.00 [kg/h] > 550.00 [hPa] < 2.97 [hPa] 5.0 [s] >= 2 times not active 500...6000 [rpm] > 0.00 [hPa] < 0.85 [-]	2.5 [s] multiple	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Manifold Pressure Sensor	P0106	adaptation value monitoring	offset value manifold pressure for load calculation in driving condition range 2	< -60.00 [hPa]	<u>driving condition range 1</u> (consna): engine speed desired mass flow delta adaptation value range 1 for time	< 800 [rpm] 5.00...25.00 [kg/h] < 0.10 [kg/h] 1.0 [s]	multiple	2 DCY
					<u>driving condition range 2 (opstra):</u> engine speed manifold pressure delta adaptation value range 2 for time	> 1400 [rpm] < 425.00 [hPa] < 2.97 [hPa] 8.0 [s]		
					<u>driving condition range 3 (opua):</u> desired mass flow manifold pressure delta adaptation value range 3 for time  <u>general:</u> engine operation in every driving condition diagnosis evap purge system engine speed manifold pressure ratio manifold pressure to ambient pressure	> 40.00 [kg/h] > 550.00 [hPa] < 2.97 [hPa] 5.0 [s]  >= 2 times not active 500...6000 [rpm] > 0.00 [hPa] < 0.85 [-]		
Boost Pressure Sensor	P0107	short to ground	signal voltage	< 0.20 [V]	engine speed	> 60 [rpm]	0.5 [s] continuous	2 DCY
	P0108	short to battery / open circuit	signal voltage	> 4.86 [V]	engine speed	> 60 [rpm]	0.5 [s] continuous	2 DCY
Intake Air Temperature Sensor	P0112	short to ground	IAT	> 130 [°C]			5.0 [s] multiple	2 DCY
	P0113	short to battery / open circuit	IAT	< -46 [°C]			5.0 [s] multiple	2 DCY
Ambient Air Temperature Sensor	P0072	short to ground	ambient air temperature	> 87 [°C]	CAN	active	6.00 [s] multiple	2 DCY
	P0070	short to battery / open circuit	ambient air temperature	< -50 [°C]	CAN	active	6.00 [s] multiple	2 DCY



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Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	IML Illum.
Intake Air Temperature	P0111	cross check	diff. ECT vs. IAT at engine start	> 125  [K]	engine off time	> 6  [h]	0 [s] once / DCY	2 DCY
			<b>and</b> diff. IAT vs. AAT at engine start (depending on engine off time)	> 125  [K]	<b>Blockheater</b> ECT @ start minus ECT @ condition: time after engine start	< 2  [K]		
			<b>and</b> diff. AAT vs. ECT at engine start (depending on engine off time)	< 125  [K]	<b>solar radiation case 1:</b> AAT @ start minus AAT @ condition: vehicle speed for time	180.0 [s]  <= 2  [K]		
Ambient Air Temperature	P0071	cross check	diff. ECT vs. IAT at engine start (depending on engine off time)	< 125  [K]	engine off time	> 6  [h]	0 [s] once / DCY	2 DCY
			<b>and</b> diff. IAT vs. AAT at engine start (depending on engine off time)	> 125  [K]	<b>Blockheater</b> ECT @ start minus ECT @ condition: time after engine start	< 2  [K]		
			<b>and</b> diff. AAT vs. ECT at engine start (depending on engine off time)	> 125  [K]	<b>solar radiation case 1:</b> AAT @ start minus AAT @ condition: vehicle speed for time	180.0 [s]  <= 2  [K]		
Vehicle Speed	P0501	plausibility check	vehicle speed	< 4  [km/h]	fuel cut off engine speed ECT	active 1520...4520 [rpm] > 40  [°C]	1980 [ms] multiple	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Knock Sensor	P0327	short to ground Port B	lower threshold	< -0.70 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	2 DCY
	P0332	short to ground Port A	lower threshold	< -0.70 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	2 DCY
	P0332	short to battery plus Port B	upper threshold	> 1.00 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	2 DCY
	P0328	short to battery plus Port A	upper threshold	> 1.00 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	2 DCY
	P0333	short to battery plus Port A	upper threshold	> 1.00 [V]	engine speed	> 1000 [rpm]	0.5 [s] continuous	2 DCY
	P0327	signal range check	lower threshold	< 0.55...5.60 [V]	engine speed ECT engine load	> 2000 [rpm] > 41 [°C] > 30.00...37.50 [%]	2.0 [s] multiple	2 DCY
	P0332	signal range check	upper threshold	> 16.50...92.00 [V]	engine speed	> 2000 [rpm]	2.0 [s] multiple	2 DCY
	P0328	signal range check	upper threshold	> 16.50...92.00 [V]	ECT engine load	> 41 [°C] > 30.00...37.50 [%]	2.0 [s] multiple	2 DCY
Knock Control	P0324	internal hardware check	signal fault counter (combustion) or signal fault counter (measuring window)	> 30.00 [-] > 2.00 [-]	engine speed	> 2000 [rpm]	0.5 [s] continuous	2 DCY
Throttle Position Sensor 1	P0122	out of range low	signal voltage	< 0.20 [V]			0.1 [s] multiple	2 DCY
	P0123	out of range high	signal voltage	> 4.81 [V]			0.1 [s] multiple	2 DCY
	P0121	rationality check	TPS1-TPS2  and  actual TPS1-calc.value  or  TPS1 - calc.value	> 5.1...6.3 [%] >  actual TPS2-calc.value  > 9.00 [%]	engine speed	> 480 [rpm]	0.3 [s] multiple	2 DCY
Throttle Position Sensor 2	P0222	out of range low	signal voltage	< 0.20 [V]			0.1 [s] multiple	2 DCY
	P0223	out of range high	signal voltage	> 4.81 [V]			0.1 [s] multiple	2 DCY
	P0221	rationality check	TPS1-TPS2  and  actual TPS2-calc.value  or  TPS2 - calc.value	> 5.1...6.3 [%] >  actual TPS1-calc.value  > 9.00 [%]	engine speed	> 480 [rpm]	0.3 [s] multiple	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Throttle Actuator	P2106	short to battery plus/ short to ground	internal check	failed			0.5 [s] multiple	2 DCY
	P2106	open circuit	internal check	failed	duty cycle or deviation throttle value angles vs. calculated value	> 80 [%]	0.5 [s] multiple	2 DCY
	P2106	temperatur / current monitoring	internal check	failed			0.5 [s] multiple	2 DCY
	P2106	functional check	internal check	failed			0.5 [s] multiple	2 DCY
	P2101	signal range check	duty cycle and ECM power stage deviation throttle value angles vs. calculated value	> 80 [%]  no failure > 4.00...50.00 [%]			5.0 [s] multiple	2 DCY
Throttle Actuator Basic Settings	P2101	rationality check					0.5 [s] multiple	2 DCY
	P0638	rationality check close movement	time to close to reference point and reference point	> 0.6 [s]  2.88 [%]	engine speed vehicle speed ECT IAT Case 1: ignition Case 2: engine shut-off-time number of checks	0 [rpm] 0 [km/h] > -20 [°C] > -20 [°C] on 4 [s] 2.00 [s]	5.0 [s] multiple	2 DCY
	P0638	signal range check @ mechanical stop low	TPS 1 signal voltage or TPS 2 signal voltage or TPS1 + TPS2	NOT (0.40...0.80) [V]  NOT (4.20...4.60) [V] NOT (4.82...5.18) [V]	vehicle speed Case 1: ignition ECT IAT Case 2: engine shut-off-time	0 [rpm] 0 [km/h] on -20...115 [°C] -20...143 [°C] 4 [s] 5...115 [°C] 5...143 [°C]	0.3 [s] multiple	2 DCY
	P2122	out of range low	signal voltage	< 0.61 [V]			0.50 [s] continuous	2 DCY
	P2123	out of range high	signal voltage	> 4.79 [V]			0.50 [s] continuous	2 DCY
Accelerator Position Sensor 2	P2127	out of range low	signal voltage	< 0.27 [V]			0.5 [s] continuous	2 DCY
	P2128	out of range high	signal voltage	> 2.43 [V]			0.5 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Multifunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Accelerator Position Sensor 1 and 2	P2138	rationality check	signal voltage sensor 1 vs. 2	>  0.17...0.70  [V]	signal voltage sensor 1 signal voltage sensor 2	> 445.00 [mV] > 445.00 [mV]	0.24 [s] continuous	2 DCY
Idle Controller	P0506	out of range low	engine speed deviation and RPM controller torque value	> 100 [rpm]  > = calculated max. value	time after engine start engine speed vehicle speed altitude ECT IAT vehicle speed external torque request	> 0.0 [s] idle 0 [km/h]  < 2700 [m] > -48 [°C] > -48 [°C] ready not demanded for manual transmission: < 34.50 [%] > 0.0 [s] idle 0 [km/h] < 2700 [m] > -48 [°C] > -48 [°C] ready not demanded	7.0 [s] multiple	2 DCY
	P0507	out of range high	engine speed deviation and RPM controller torque value	< -100 [rpm]  < = calculated min. value	engine load time after engine start engine speed vehicle speed altitude ECT IAT vehicle speed external torque request	< 34.50 [%] > 0.0 [s] idle 0 [km/h] < 2700 [m] > -48 [°C] > -48 [°C] ready not demanded	7.0 [s] multiple	2 DCY

Injection Valves	P0201	open circuit	signal voltage	4.50...5.50 [V]	injection valve engine speed	switched off > 80 [rpm]	0.50 [s] continuous	2 DCY
	P0202							
	P0204							
	P0205							
	P0203							
	P0261	short to ground	signal voltage	< 3.00 [V]	injection valve engine speed	switched off > 80 [rpm]	0.50 [s] continuous	2 DCY
	P0264							
	P0270							
	P0273							
	P0267							
	P0262	short to battery plus	signal current	2.20...4.00 [A]	injection valve engine speed	switched on > 80 [rpm]	0.50 [s] continuous	2 DCY
	P0265							
	P0271							
	P0274							
	P0268							

OBD Summary Table MY 11  
Issue Date 03-09-2010 Engine Code C8TA  
OBD-Group BMW-15 Test-Group BMWXV02.5U35 Revision Date

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
Fuel Pump Relay	P0627	open circuit	signal voltage	4.50...5.50 [V]	pump relay	commanded off	0.50 [s] continuous	2 DCY
	P0627	short to ground	signal voltage	< 3.00 [V]	engine speed pump relay	commanded off > 80 [rpm]	0.50 [s] continuous	2 DCY
	P0629	short to battery plus	signal current	0.60...1.20 [A]	engine speed pump relay	commanded on > 80 [rpm]	0.50 [s] continuous	2 DCY
Engine-Off-Time	P150A	comparison of engine off time from instrument cluster control unit with engine after run time	difference between engine-off-time and ECM after-run time	< -12.0 [s]	key-on after ECM after-run time CAN	active	6.00 [s] once / DCY	2 DCY
	P150A	comparison of engine off time from instrument cluster control unit with engine after run time	difference between engine-off-time and ECM after-run time	> 12.0 [s]	key-on during ECM after-run time CAN	active active	6.00 [s] once / DCY	2 DCY
Fan Control Coolant Temperature Sensor	P2185	short to battery / open circuit	ECT outlet	< -40 [°C]			2.0 [s] continuous	2 DCY
	P2184	short to ground	ECT outlet	> 140 [°C]			2.0 [s] continuous	2 DCY
Ignition Coils	P0351	open circuit	signal current	0.25...-2.0 [mA]	engine speed	> 680 [rpm]	2.0 [s] continuous	2 DCY
	P0352		signal current					
	P0354		internal check	failed				
	P0355							
	P0353							
	P2300	short to ground	signal current	> 24.0 [mA]	engine speed	> 680 [rpm]	2.0 [s] continuous	2 DCY
	P2303							
ECM: WDA	P2309							
	P2312							
	P2306							
	P2301	short to battery plus	signal voltage	> 5.1...7.0 [V]	engine speed	> 680 [rpm]	2.0 [s] continuous	2 DCY
	P2304							
ECM: EEPROM	P2310							
	P2313							
	P2307							
ECM: WDA	P0606	function monitoring: WDA	general cause	failure			0.5 [s] continuous	2 DCY
	P0606	function monitoring: WDA	internal check	failure			0.5 [s] continuous	2 DCY
	P0606	function monitoring: WDA	overvoltage detection	failure			0.5 [s] continuous	2 DCY
ECM: EEPROM	P0606	EEPROM check	check	failed			0.5 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
ECM: Self Check for Sensor IC	P0606	internal hardware check (electrical adjustment communication, voltage supply)	check	failed			0.50 [s] continuous	2 DCY
ECM: Sensor Reference Circuit A	P0641	signal range check	signal voltage deviation	> +/- 0.3 [V]			0.5 [s] continuous	2 DCY
ECM: Sensor Reference Circuit B	P0651	signal range check	signal voltage deviation	> +/- 0.3 [V]			0.5 [s] continuous	2 DCY
ECM: Sensor Reference Circuit C	P0697	signal range check	signal voltage deviation	> +/- 0.3 [V]			0.5 [s] continuous	2 DCY
ECM: 5V Supply Voltage	P0606	internal hardware check	under- / overvoltage detection				2.0 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: A/D converter	test voltage / test pulse check	failed			0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: torque	comparison with allowed engine torque	incorrect	internal engine speed	> 600 [rpm]	0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: engine speed deviation	difference between calculated and internal engine speed	> 320 [rpm]	internal engine speed	> 520 [rpm]	0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: ignition timing	internal check	failed			0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: intern	system reaction	incorrect			0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: injection rate limitation	system reaction	incorrect			0.5 [s] continuous	2 DCY
ECM: EGAS module	P0169	function monitoring: injection time	comparison with fuel quantity	incorrect	internal engine speed	> 1200 [rpm]	0.5 [s] continuous	2 DCY
ECM: EGAS module	P0169	function monitoring: lambda mode	internal check	failed	internal engine speed	> 1200 [rpm]	0.5 [s] continuous	2 DCY
ECM: EGAS module	P0606	function monitoring: accelerator position	internal check	failed			0.5 [s] continuous	2 DCY

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
<b>ECM: EGAS module</b>	P0169	function monitoring: mixture control	correction factor	incorrect	internal engine speed	> 1200 [rpm]	0.5 [s] continuous	2 DCY
	P0169	function monitoring: mixture control	fuel quantity	incorrect			0.5 [s] continuous	2 DCY
<b>ECM: EGAS module</b>	P0606	monitoring modul	function controller check and monitoring module check	failed no failure	SPI-interface	no failure	0.5 [s] continuous	2 DCY
	P0169	function monitoring: load plausibility	abs. difference between predicted and real air mass	> 11.30 [%]	engine speed	>= 1200 [rpm]	0.5 [s] continuous	2 DCY
<b>CAN: Vehicle Speed Sensor</b>	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: initialisation error	327.08 [km/h]	time after ignition on	500 [ms]	1980 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: low voltage error	327.25 [km/h]	time after ignition on	500 [ms]	1980 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: sensor error	327.42 [km/h]	time after ignition on	500 [ms]	480 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	vehicle speed	>= 325 [km/h]	time after ignition on	500 [ms]	2100 [ms] continuous	2 DCY
	U0415	CAN communication with Vehicle Speed Sensor	speed sensor signal: out of range	326.39 [km/h]	time after ignition on	500 [ms]	480 [ms] continuous	2 DCY
<b>CAN: Internal Fault</b>	P0606	CAN controller RAM check	RAM error	memory checksum error	initialization phase		none [ ] once / DCY	2 DCY
<b>CAN: CAN-Bus A</b>	U0001	reading back sent message	CAN message	no feedback	time after ignition on	500 [ms]	250 [ms] continuous	2 DCY
	U0002	CAN communication check	global time out	receiving no message	time after ignition on	500 [ms]	450 [ms] continuous	2 DCY
<b>CAN: TCM</b>	U0101	CAN communication with TCM	received CAN message	no message	time after ignition on	500 [ms]	500 [ms] continuous	2 DCY
	U0402	CAN communication with TCM	received data	implausible message	time after ignition on	500 [ms]	60 [ms] continuous	2 DCY



OBD Summary Table MY 11  
 Issue Date 03-09-2010 Engine Code CBTA  
 OBD-Group BMW-15 Test-Group BMWXV02.5U35 Revision Date

Component / System	Fault Code	Monitor Strategy Description	Malfunction Criteria	Threshold Value	Secondary Parameters	Enable Condition	Monitoring Time Length	MIL Illum.
CAN: TCM	U0302	CAN communication with TCM	received AT vehicle data	TCM signal	time after ignition on		500 [ms] continuous	2 DCY
CAN: Instrument Cluster	U0155	CAN communication with Instrument Cluster Modul	received CAN message	no message	time after ignition on		500 [ms] 2000 [ms] continuous	2 DCY
	U0423	CAN communication with Instrument Cluster Modul	received data	implausible message	time after ignition on		500 [ms] 3000 [ms] continuous	2 DCY
CAN: Ambient Air Temperature Sensor	U0423	communication with Instrument Cluster Modul	ambient temperatur value (initialization)	00h [-]	key on status ambient temperatur from instrument cluster electrical check ambient temperature sensor	no fault no fault	3.0 [s] continuous	2 DCY
CAN: Gateway	U0146	CAN communication with Gateway	received CAN message	no message	time after ignition on		500 [ms] continuous	2 DCY
CAN: Brake Unit	U0121	CAN communication with Brake Unit	received CAN message	no message	time after ignition on		500 [ms] 500 [ms] continuous	2 DCY
	U0415	CAN communication with Brake Unit	received data	implausible message	time after ignition on		500 [ms] 400 [ms] continuous	2 DCY



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 3/15/2010 6:21:07 PM  
**Subject:** RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify  
<mailto:Snyder.Jim@epamail.epa.gov>

Hello Jim,

I just checked and I have the notification.

Thanks,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, March 15, 2010 1:59 PM  
To: Hart, Robert (VWoA)  
Subject: RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Bob, I waived the Bugatti request this morning. Did you receive an email notification of it from Verify?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From:  
"Hart, Robert (VWoA)" <[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
03/15/2010 07:50 AM

Subject:  
RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim,

According to Germany, the 1200 hp engine has a modification to the catalyst coating but the precious metal loading stays at the same level. Bugatti uses EPA assigned DF's so it would still be covered within the same durability group statistic.

Let me know if you have any other questions.

Best regards,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, March 10, 2010 4:30 PM  
To: Hart, Robert (VWoA)  
Subject: Re: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Yes, I see it. I'm backed up today but I'd like to call and ask a few questions about it tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
03/10/2010 11:37 AM

Subject:  
VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim.

This is just a “heads-up” for the running change test waiver request that I just submitted to Verify. Bugatti is bumping up the engine output to 1200 h.p..

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard"  
**Sent:** Tue 3/16/2010 11:47:49 AM  
**Subject:** 2009 Volkswagen Group Final LDT CAFE  
2009\_CAFE\_LDT\_VWX\_VER01.txt

Hello Bob;

Thanks for returning my phone call yesterday. Please find the 2009 Volkswagen Group LDT Final CAFE CFEIS file as you suggested we start the 2009 model year EPA CAFE calculation process. I understand this will be the last year where we continue using the old CFEIS system for this submission. Would you return the calculation to me via an email or through the Verify mail system?

Best regards,  
Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

FS 590 2009 8 37891 24.6421 24.6 24.6 23.1  
 ZZ  
 F1 590 001 2009 219 6 G M 00 Y Y N N N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.148 2.370 1.556 1.155 0.859 0.686  
 FR 02 O 4.171 2.340 1.521 1.143 0.867 0.691  
 FL 01 L 0 0 650 650 650  
 FL 01 H 0 0 2000 2000 2000  
 FL 02 L 0 0 700 700 700  
 FL 02 H 0 0 2000 2000 2000  
 FC TOUAREG and AUDI Q7 3.6L VR6  
 FF 590 01 140 01 001 01 4.56 BHK 01 5500 20.3 3 9VWXT03.6276 2955  
 FF 590 02 320 01 002 02 4.56 BHK 01 5500 20.4 3 9VWXT03.6276 6086  
 FT 001 01 C 1074468 01  
 FT 001 01 H 1074469 01  
 FT 002 01 C 1078851 01  
 FT 002 01 H 1078852 01  
 ZZ  
 F1 590 002 2009 254 8 G M 00 Y Y N N N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.148 2.370 1.556 1.155 0.859 0.686  
 FL 01 L 0 1100 1100 1100 1100 1100  
 FL 01 H 0 6900 6900 6900 6900 6900  
 FC Audi Q7 4.2L FSI V8  
 FF 640 01 320 01 001 01 4.32 BAR 01 6000 21.1 3 9ADXT04.23UD 1194  
 FT 001 01 C 1085901 00  
 FT 001 01 H 1085902 00  
 ZZ  
 F1 590 003 2009 254 8 G M 00 Y Y N N N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.148 2.370 1.556 1.155 0.859 0.686  
 FL 01 L 0 1100 1100 1100 1100 1100  
 FL 01 H 0 6900 6900 6900 6900 6900  
 FC TOUAREG 4.2L V8  
 FF 640 02 140 01 001 01 4.32 BAR 01 5500 20.3 3 9ADXT04.23UD 96  
 FT 001 01 C 1085334 01  
 FT 001 01 H 1085335 01  
 ZZ  
 F1 590 004 2009 181 6 D M 00 Y N N Y N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.148 2.370 1.556 1.155 0.859 0.686  
 FL 01 L 0 1100 1100 1100 1100 1100  
 FL 01 H 0 4300 4300 4300 4300 4300  
 FC TOUAREG V6 3.0L TDI  
 FF 590 01 140 01 001 01 3.90 CATA 01 5500 20.4 3 9ADXT03.03LD 833  
 FT 001 01 C 9ADX10000221 00  
 FT 001 01 H 9ADX10000222 00  
 ZZ  
 F1 590 005 2009 181 6 D M 00 Y N N Y N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.148 2.370 1.556 1.155 0.859 0.686  
 FL 01 L 0 1100 1100 1100 1100 1100  
 FL 01 H 0 4300 4300 4300 4300 4300  
 FC AUDI Q7 V6 3.0L TDI  
 FF 590 01 320 01 001 01 3.90 CATA 01 6000 19.7 3 9ADXT03.03LD 1120  
 FT 001 01 C 9ADX10000016 00

FT 001 01 H 9ADX10000017 00  
 ZZ  
 F1 590 006 2009 194 6 G M 00 Y Y N N N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 FR 01 O 4.171 2.340 1.521 1.143 0.867 0.691  
 FL 01 L 0 1100 1100 1100 1100 1100  
 FL 01 H 0 3100 3100 3100 3100 3100  
 FC Audi Q5 3.2L V6  
 FF 640 01 330 01 001 01 4.22 CALB 01 4500 12.0 3 9ADXT03.23UC 6531  
 FT 001 01 C 9ADX10001141 00  
 FT 001 01 H 9ADX10000643 00  
 ZZ  
 F1 590 007 2009 121 4 G M 00 Y Y N Y N 04 N 8  
 F2 01 S6 4 2 N N 3 C N  
 F2 02 S6 F 2 N N 3 C N  
 F2 03 M6 F 2 N N N N N  
 FR 01 O 3.949 2.303 1.556 1.164 0.860 0.688  
 FR 02 O 3.949 2.303 1.556 1.164 0.860 0.688  
 FR 03 O 3.923 2.158 1.895 1.379 1.091 0.917  
 FL 01 L 0 0 760 760 760 0  
 FL 01 H 0 0 3100 2300 1675 0  
 FL 02 L 0 0 760 760 760 0  
 FL 02 H 0 0 3100 2300 1675 0  
 FL 03 1 0  
 FC TIGUAN 4MOTION TIGUAN fwd 2.0L  
 FF 590 01 165 01 001 01 4.24 CCTA 01 4000 16.6 3 9AD XV02.03UA 7315  
 FF 590 01 160 02 002 02 4.24 CCTA 01 3875 15.9 3 9AD XV02.03UA 11317  
 FF 590 01 160 03 003 03 3.30 CCTA 01 3875 14.4 3 9AD XV02.03UA 444  
 FT 001 01 C 1080420 00  
 FT 001 01 C 1080427 00  
 FT 001 01 C 1080428 00  
 FT 001 01 C 1080434 00  
 FT 001 01 H 1080421 00  
 FT 002 01 C 9008456 01  
 FT 002 01 H 9008416 01  
 FT 003 01 C 1080444 00  
 FT 003 01 H 1080700 00  
 ZZ

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 3/17/2010 1:48:31 AM  
**Subject:** RE: VW/AUDI Meeting March 18, 2010

Hi Jim:

I will bring a projector.

Thanks,

Ex. 7

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Tuesday, March 16, 2010 3:43 PM  
**To:** Ex. 7  
**Subject:** Re: VW/AUDI Meeting March 18, 2010

Thanks, I forwarded it so we can look at it beforehand.

Do you have a projector or do I need to reserve one?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Ex. 7  
**To:** Jim Snyder/AA/USEPA/US@EPA

**Cc:** Ex. 7

Date:

03/16/2010 10:22 AM

Subject:

VW/AUDI Meeting March 18, 2010

Hello Jim:

In preparation for our meeting on March 18, 2010, I am providing, as a refresher, the report from our last meeting on January 27, 2010, including the presentation material.

Also attached is the new presentation material.

Please treat all materials as CONFIDENTIAL.

See you on Thursday.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

[attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part1.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part2.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Meeting Report\_JAN\_27\_2010.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "00\_Agenda\_EPA\_Cert.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "01\_HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "02\_EPA\_operation\_mode.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "03\_EPA\_EV\_FCEV.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "04\_HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "05\_EPA\_test\_matrix\_types.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "06\_EPA\_Coldstart\_valve.pdf" deleted by Jim Snyder/AA/USEPA/US]



**To:** Jim Snyder/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 3/22/2010 7:17:16 PM  
**Subject:** Test Report

Hello Jim, Steve and Chris:

As a follow-up to our meeting last week, one of my colleagues in Germany has asked if EPA could possibly "...share a SOC test protocol and the +/- 1% criteria calculation...". Normally, the reference to protocol means report.

They would be interested in seeing what data are recorded and the data content of the calculation. If necessary, any vehicle- or manufacturer-specific information could be lined out.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Thomas, Suanne"  
**Sent:** Fri 3/26/2010 1:11:59 PM  
**Subject:** VW: AECD Submission V6 diesel 3.0L Test Group follow-up  
[AECD\\_MY11\\_V6TDI\\_EPA\\_DPF.pdf](#)  
[SCR\\_driver\\_message\\_system\\_MY11.pdf](#)  
[AECD\\_Table\\_B3\\_V6TDI\\_update03h.pdf](#)  
[suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)

Hi Jim:

This note is to follow-up on our phone conversation on 18Feb regarding the V6 diesel AECD documentation. Please see the attached files and let me know if you would like to discuss in more detail.

During our call, my understanding was that you would like to see the system description for SCR strategy when the urea is low. And also a description of the regeneration of the particulate trap. The PM-Trap-Strategies are active under all normal driving conditions and don't change due to specific trigger signals. Same for the SCR-Warning-System.

Also included is table „B3“ with the list of sensors and actuators with default mode/consequence. For clarification, here is additional definition of terms used in these documents: "Reduced EGR" means in most of the cases "EGR shut off" --> See Table B3; "Limited Torque" means reduced fuel (nothing else); "Limp Home" means further reduction of fuel mass compared to "Limited Torque" (--> Extremely Limited Torque). SCR is not affected by "Limp Home".

Any comments are welcome.

Best regards, Suanne

From: Thomas, Suanne  
Sent: Tuesday, February 16, 2010 1:05 PM  
To: 'snyder.jim@epa.gov'  
Subject: RE: VW: AECD Submission V6 diesel 3.0L Test Group

Hi Jim: just checking if you have any comments/feedback for us.

Take care, Suanne

From: Thomas, Suanne  
Sent: Monday, February 01, 2010 2:11 PM

To: 'snyder.jim@epa.gov'  
Subject: VW: AECD Submission V6 diesel 3.0L Test Group

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

Suanne Thomas

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4206  
Cell: (248) 797-4074  
FAX: (248) 754-4207  
E-Mail: suanne.thomas@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 4/6/2010 2:38:00 PM  
**Subject:** VW Group: New Test Waiver Requests Submitted - MY 2011 Audi

Hello Jim,

I just submitted two new test waiver requests (1 EDV and 1 FEDV) for Audi test group BADXV04.23UH. The EDV was tested for exhaust and Evap.

I believe I included enough information in the request for you to make a decision.

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 4/6/2010 3:15:08 PM  
**Subject:** RE: Lamborghini

Hello Jim,

There is only the one transmission. It has a button to select a manual mode which allows you to use the paddles on the steering wheel to shift but there are no plans for a manual transmission with a clutch pedal. The transmission reverts back to automatic if the paddles are not used after a period of time.

We perform the tests to allow us to check both methods of FE calculation. Then we use whichever is better. We substitute the SC03 and Cold CO tests from the appropriate worst case (manual or automatic trans.) for the calculations.

Best regards,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, April 05, 2010 1:07 PM  
To: Hart, Robert (VWoA)  
Subject: Lamborghini

Bob, I have a couple more questions on the Lamborghini.

- Is there still a manual trans version to be submitted or just an automatic?  
-The FEDV shows a City, HWFE and US06. Why the US06, are you using 5 cycle testing or Derived? If you are using are you going with 5 cycle FE, are you proposing to use SC03 / Cold CO data from the EDV?

Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 4/13/2010 1:58:55 PM  
**Subject:** Test Process Question

Hello Jim,

Because it's been a while since Audi has had confirmatory tests that include an Evap test, they would like to verify the order of testing.

As we understand it, the process is as follows:

FTP

2-Day Evap test

No fuel change.

LA4 (as prep for US06)

US06

HWFET (as prep for HWFET)

HWFET

Is this correct?

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 4/14/2010 12:09:39 PM  
**Subject:** RE: VW Group: Bugatti Carline

Hi Jim,

The A8 and A8L are different carlines.

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, April 13, 2010 5:21 PM  
To: Hart, Robert (VWoA)  
Subject: Re: VW Group: Bugatti Carline

Yes, after reading and discussing with Tom and Dave, I am convinced the Veyron GT is not a different car line.

I'm still looking into it for other instances. Say, if the Audi A8L had a different FE label, I think it would need to be listed separately from the A8.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
04/12/2010 11:11 AM

Subject:  
VW Group: Bugatti Carline



Hello Jim,

I need to finish this running change fairly soon. Have you come to any conclusion on our Bugatti carline discussion yet?

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 4/15/2010 11:27:38 AM  
**Subject:** Question Answered -FW: Test Process Question

Hello Jim,

I called Ben Haynes and got the answer to the question below.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Tuesday, April 13, 2010 9:59 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Test Process Question

Hello Jim,

Because it's been a while since Audi has had confirmatory tests that include an Evap test, they would like to verify the order of testing.

As we understand it, the process is as follows:

FTP

2-Day Evap test

No fuel change.

LA4 (as prep for US06)

US06

HWFET (as prep for HWFET)

HWFET

Is this correct?

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

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Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 4/15/2010 6:26:41 PM  
**Subject:** Supplemental Information Submitted for BADXT03.03UG

Hello Jim,

Vehicle ID: B3UG-TAQ cfg. 0 Test Group: BADXT03.03UG

This is just a heads-up for the supplemental information submission for the Audi Q7 diesel confirmatory tests.

The information has been successfully submitted.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 4/19/2010 6:53:51 PM  
**Subject:** Test Waiver Request Submitted Under New Test Group

Hello Jim,

I resubmitted the test waiver request for test vehicle EDV B3UG-TAQ cfg 1 as cfg 2 for the LTD3 diesel Touareg under the new test group BADXT03.02UG. This is the diesel we spoke about last week. You told me that cfg. 0 has been selected for confirmatory testing. This vehicle as cfg. 1 was waived.

Cfg. 1 and 2 are identical, except that cfg. 2 is now an EDV. I may not have needed to create cfg. 2 but there is no way to delete a configuration once it is created.

We created this new test group to separate the LTD3 vehicle from the LTD4 test group because, as I explained, the LTD4 SFTP tests did not meet LTD3 SFTP standards.

Call me if you have any questions.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Thomas, Suanne"  
**Sent:** Fri 4/23/2010 9:37:17 PM  
**Subject:** RE: AECD Submission V6 diesel 3.0L Test Group follow-up  
[suanne.thomas@vw.com](mailto:suanne.thomas@vw.com)

Hi Jim: This is just to follow-up my phone message today, I would like confirm that our discussions on the AECDs for this concept for MY2011 are completed. Of course we are open to provide additional information to you however I would like to be sure that we are ready to process our MY2011 certification paperwork.

Thank you for your time spent in your review and we are willing to continue to improve the information format for future model year submissions. Any suggestions are welcome.

Take care, Suanne

From: Thomas, Suanne  
Sent: Friday, March 26, 2010 9:12 AM  
To: 'snyder.jim@epa.gov'  
Cc: Hart, Robert (VWoA)  
Subject: VW: AECD Submission V6 diesel 3.0L Test Group follow-up

Hi Jim:

This note is to follow-up on our phone conversation on 18Feb regarding the V6 diesel AECD documentation. Please see the attached files and let me know if you would like to discuss in more detail.

During our call, my understanding was that you would like to see the system description for SCR strategy when the urea is low. And also a description of the regeneration of the particulate trap. The PM-Trap-Strategies are active under all normal driving conditions and don't change due to specific trigger signals. Same for the SCR-Warning-System.

Also included is table „B3“ with the list of sensors and actuators with default mode/consequence. For clarification, here is additional definition of terms used in these documents: "Reduced EGR" means in most of the cases "EGR shut off" --> See Table B3; "Limited Torque" means reduced fuel (nothing else); "Limp Home" means further reduction of fuel mass compared to "Limited Torque" (--> Extremely Limited Torque). SCR is not affected by "Limp Home".

Any comments are welcome.

Best regards, Suanne

From: Thomas, Suanne  
Sent: Tuesday, February 16, 2010 1:05 PM  
To: 'snyder.jim@epa.gov'  
Subject: RE: VW: AECD Submission V6 diesel 3.0L Test Group

Hi Jim: just checking if you have any comments/feedback for us.

Take care, Suanne

From: Thomas, Suanne  
Sent: Monday, February 01, 2010 2:11 PM  
To: 'snyder.jim@epa.gov'  
Subject: VW: AECD Submission V6 diesel 3.0L Test Group

Dear Jim:

Attached is the information we just discussed regarding the AECD information for our V6 diesel.

We have used a new format for the information with the intent to make it more clear how the strategies work to assist in your review.

Please let me know if you would like an overview of the information via conference call. We are happy to do that, just let me know what time would be convenient for you.

Note: a timeslot in the morning would be preferable for us.

Sincerely,

Suanne Thomas

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326



Phone: (248) 754-4206  
Cell: (248) 797-4074  
FAX: (248) 754-4207  
E-Mail: suanne.thomas@vw.com

**To:** Willem VandenBroek/AA/USEPA/US@EPA[]

**Cc:** Jim Snyder/AA/USEPA/US@EPA[]

**Ex. 7**

**Ex. 7**

**From:** **Ex. 7**

**Sent:** Mon 4/26/2010 1:43:02 PM

**Subject:** 2011 EPA Certification Fees

[2011 EPA Cert Fees Bugatti.pdf](#)

[Audi six TGs 2011 to Ajax.pdf](#)

Hello Bill;

I thought it would better enable you to keep track of the Volkswagen Group (Volkswagen, Audi, Bentley, Lamborghini, Bugatti) certification fees paid, since our payments are made electronically and the fee filing forms are mailed to St. Louis.

I am attaching the first 2011 Volkswagen Group Certification Fee filing form for the Bugatti test group. This fee was paid or transferred to the EPA account last Friday, April 23rd. This fee filing form was mailed to St. Louis on the same day.

Additionally, six Audi test group fee filing forms are attached in a single pdf file for which the payment will be made this Friday, April 30th. I will mail these fee filing forms to St. Louis today.

If you rather not be notified with these email notices, or have a comment please feel free to contact me directly.

Best regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

**Ex. 7**



U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM  
FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2010

Manufacturer Name VOLKSWAGEN GROUP OF America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$34,849) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,591)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$35,967)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$47,928) |

EPA standard engine family or test group or  
HDV Evaporative family name:

B	B	G	T	V	0	8	.	0	V	1	6
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Amount paid (U.S. Funds Only):

\$ 34,849.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

Reduced Fee Section (40 CFR \$1027.120)

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_  
Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_  
Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


**Ex. 6**

Company Representative: RICHARD E. THOMAS

Signature: \_\_\_\_\_

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2010

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).  
(2) Send checks and this form to:

Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000

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This form expires: 1/1/2011



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HDV Evaporative family name:

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**Ex. 6**

Company Representative: RICHARD E. THOMAS

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 23 / 2010

E-mail Address: Richard.Thomas@VW.com

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EPA standard engine family or test group or  
HDV Evaporative family name:

B A D X T 0 3 . 0 3 U G

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Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 23 / 2010

E-mail Address: Richard.Thomas@ VW.com

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Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 23 / 2010

E-mail Address: Richard.Thomas@VW.com

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Company Representative: RICHARD E. THOMAS

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 23 / 2010

E-mail Address: Richard.Thomas@VW.com

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Company Representative: RICHARD E. THOMAS

Signature:

Title: Emission Cert Strategist

Phone/Fax: 248 754 4213

/ 248 754 4207

Date: 4 / 26 / 2010

E-mail Address: Richard.Thomas@VW.com

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| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$34,849) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,591)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$35,967)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$47,928) |

EPA standard engine family or test group or  
HDV Evaporative family name:

B	A	D	X	V	0	3	.	0	3	U	F
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only):

\$ 34,849.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT/ACH

Reduced Fee Section (40 CFR §1027.120)

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: RICHARD E. THOMAS

Signature:

Title: Emission Cert Strategist

Phone/Fax: 248 754 4213

/ 248 754 4207

Date: 4/26/2010

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: Forms may be found and submitted with or without payments online at [www.Pay.gov](http://www.Pay.gov).
- (2) Send checks and this form to:

Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000

- (3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)
- (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)
- (5) Forms not submitted under (1) and (2) above can be sent as email attachments to [Fees@epa.gov](mailto:Fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 1/1/2011

## Page 2

## Instructions

**NOTE: This form applies to complete certification applications that are received in Calendar Year (CY) 2010.**

Fee amounts due are subject to change every year. Use of the form for the wrong calendar year can cause incorrect payments and delays. Get the form for the calendar year of your application submission at [www.epa.gov/otaq/fees.htm](http://www.epa.gov/otaq/fees.htm) or [www.Pay.gov](http://www.Pay.gov). Forms and payments may be submitted online at [www.Pay.gov](http://www.Pay.gov).

**Manufacturer Name and Address**

List the applicant's corporate name and corporate address as it will appear on the Certificate of Conformity.

**Certification Request Type**

Check the box that specifies the certification request type. If you are paying a reduced fee, still mark the appropriate certification request type.

**EPA Standard Engine Family or Test Group or HDV Evaporative Family Name**

Enter the appropriate EPA standardized engine family or test group name as it will appear on the Certificate of Conformity. Forms and payments for Modification and Test vehicles under 40 CFR 85.1509 must list the engine family for the currently valid Certificate of Conformity under which the vehicles are being imported.

**Amount Paid**

Enter the appropriate fee amount for the designated certification request type. The full fee, payable in U.S. dollars, along with a properly completed fee filing form, must be received before certification review can begin. All banking fees are the responsibility of the manufacturer. The reduced fee amount (if applicable) is also entered in this box.

**Check Number, EFT/ACH, or EFT/WIRE (for offline payments)**

The check number is mandatory for check, money order, bank draft, or certified check; or enter the letters "EFT/WIRE" or "EFT/ACH" if sending an electronic funds transfer. Indicate the standard engine family or test group name on the check. **Make checks payable to "U.S. Environmental Protection Agency".**

Indicate in the EFT message field the information:

**For Wire:** RDFI: Federal Reserve Bank; Location Code (Same as EPA Account Number): 68-01-0099; "EPA MVECP Fee"; ABA number: 021030004. (ABA number is same as Swift Code or Routing Number for participating banks. For further information, email [Fees@epa.gov](mailto:Fees@epa.gov)). Note: the wire detail corresponding to ABA 021030004 is "TREAS NYC"; this is the same as the Federal Reserve Bank.

**For ACH:** RDFI: Federal Reserve Bank, Routing Transit number: 051036706, Account number: 540006, Account Name: U.S. Environmental Protection Agency (EPA). Note: the 051036706 company name appears as "U.S. EPA"; the receiving bank is still the Federal Reserve Bank of Cleveland.

Please include in wire or ACH message fields the following: the words "MVECP Fees", manufacturer name, and engine family/test group/HDV evaporative group name(s). If space is limited, list one name and the number of families.

**Reduced Fee Section (if applicable)**

Reduced fee submissions must be supported by the reduced fee calculation on Page 1 of this form and any relevant supporting information requested by EPA at the time of application review. Enter the number of vehicles/engines projected for sale under the engine family/test group. Enter the aggregate projected retail sales price of the vehicles or engines and multiply that value by 1% (.01). Enter and pay the reduced fee amount (minimum \$750). If you are an ICI, please enter the VIN for any vehicles/engines already (or soon to be) in your possession. For any additional VINs, please use a separate page. For further information see the reduced fee provisions under 40 CFR §1027.120.

**Company Representative**

Enter the representative's name, signature, title, phone/fax, date, and an e-mail address. **Note: an acknowledgment of fees received will be sent to this e-mail address. No other receipts will be sent.**

**Bank Address for Private Mail Shipment (other than U.S. Postal Service)**

If using a private shipping service such as Federal Express (or other service), send checks with fee filing forms to:

U.S. Bank  
Government Lockbox 979032  
1005 Convention Plaza  
SL-MO-C2-GL  
St. Louis, MO 63101

To: David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]

Cc:

From:

**Ex. 7**

Sent: Wed 4/28/2010 1:16:42 PM

Subject: 2009 Volkswagen Group NOx Fleet Average Final Report

CBI\_9VWX\_COMMON\_CR1\_AB\_T\_R00.XLS

Hello Dave;

As we discussed today on the phone, I wanted to bring to your attention that the three HLDI test groups as listed on the "Current MY Credit Calculation" tab, do not appear in the summary section at the bottom of the page.

The attached file will be submitted to the agency via Verify later today. If you have any questions, please contact me directly.

Best regards,

**Ex. 7**

VOLKSWAGEN GROUP OF AMERICA, INC.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Linc Wehrly/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 5/6/2010 9:04:53 PM  
**Subject:** Volkswagen 2.0L TDI AECD Description

**Ex. 7**

Hello Jim:

Please find a copy of the 2011 MY Volkswagen 2.0L TDI AECD description for your review/approval in the EPA VERIFY system. There is a second document in the form of a stand-alone request for approval of the "Ki-Factors," (that is, the upward- and downward-adjustment factors for the regeneration of the DPF and the NOx adsorber). This is the document referred to as Attachment No.2 in the Table of Contents for the AECD description.

If there are any questions, please let me know.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 5/11/2010 6:53:18 PM  
**Subject:** VW Group: Test Waiver Requests Submitted

Hello Jim,

This is just a "heads up" for the two test waiver requests I submitted.

The Jetta gets a new body for MY 2011. This is a new test group for MY 2011 (BVWXV02.0MPI). It is an updated reincarnation of the naturally aspirated 2.0l engine that was discontinued for the U.S. after MY 2006. It uses MPI fuel injection similar to the current 2.5l 5 cylinder engine. It comes equipped with either an automatic 6 speed or a manual 5 speed transmission. The Jetta is the only model planned for this test group in MY 2011. We will also be submitting 2.5l, 5 cyl. versions very soon.

Let me know if you need any more information.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 5/14/2010 3:35:03 PM  
**Subject:** VW Test Waiver Requests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

As a heads up, I have submitted 12 VW test waiver requests this morning representing two carryover 2.5L test groups. Each includes all new tests as the result of a newly designed replacement for Jetta Sedan models and revised manual transmission gearing.

Let me know if you have any questions.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; inc Wehrly/AA/USEPA/US@EPA;"Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Fri 11/19/2010 9:47:21 PM  
**Subject:** 2012 Volkswagen Pre-Certification Document and Meeting Request

Hello Jim:

Thus far, we have completed preparation of the 2012 Volkswagen pre-certification letter, in accordance with the existing "Dear Manufacturer" guidance letter on this topic (CCD-03-12). Our letter will be filed with the VERIFY system today.

In the letter we state that we will follow with our 2012 Pre-Model Year GHG Report. We are finishing this right now and intend to submit the report to the VERIFY system in the very near future.

We also state that we would like to schedule a meeting. At the meeting we would walk through the pre-certification letter and attachments and present to 2012 pre-model year GHG report. As mentioned the documents will be available for your prior review.

With the Thanksgiving Holiday next week, staff schedules are somewhat mixed, as might also be the case at EPA. Therefore, I would like to propose a meeting with EPA on Wednesday, December 1, 2010.

Please let me know if this date is acceptable.

Best regards,

Len

---

Leonard W. Kata



Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Tue 11/30/2010 5:54:15 PM  
**Subject:** Accepted: VW Pre-Cert mtg and 2012 pre-model year GHG report

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 12/3/2010 11:47:58 AM  
**Subject:** VW526710023 11-30-10  
[VW526710023\\_11-30-10.pdf](#)


Good morning Bob,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact Jim Snyder or me.

Thanks for your patience Bob,

Vince Mazaitis

CERT

NVFEL Laboratory Test Data								CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Information				Vehicle ID: VW526710023				
	Test Date: 11/30/2010			MFR Name: VOLKSWAGEN				
	Key Start / Hot Soak: 13:48:11 / 09:39			MFR Codes: 590 VWX				
	Fuel Container ID: F00023			Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel			Transmission: AUTO				
	Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)			Shift Schedule: A09980005				
	Calculation Method: Gasoline			Beginning Odometer: 004303.0 MI				
Pretest Remarks:				Drive Schedule: ftp4bag				
				Soak Period: 24.0 hours				
<b>Bag Data</b>								
<b>Phase 1</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NonMeth HC</b>	
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample		10.182	30.307	2.367	1.240	2.510		
Ambient		2.703	0.955	0.014	0.044	1.931		
Net Concentration		7.730	29.440	2.355	1.200	0.759	6.911	
Remarks:								
<b>Phase 2</b>								
Sample		3.350	0.690	0.191	0.573	1.849		
Ambient		2.542	0.000	0.008	0.043	1.918		
Net Concentration		0.917	0.690	0.183	0.531	0.014	0.902	
Remarks:								
<b>Phase 3</b>								
Sample		3.306	6.238	0.497	0.865	1.924		
Ambient		2.451	0.000	0.010	0.043	1.912		
Net Concentration		1.013	6.238	0.488	0.825	0.136	0.866	
Remarks:								
<b>Phase 4</b>								
Sample		2.867	0.605	0.334	0.488	1.871		
Ambient		2.733	0.000	0.010	0.043	1.920		
Net Concentration		0.234	0.605	0.325	0.447	0.021	0.211	
Remarks: This test has particulate results.								
<b>Results</b>								
	<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NMHC / NMOG</b>	<b>Vol MPG</b>	
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)	
Phase 1	0.098	0.757	0.091	485.1	0.011	0.088 / 0.092	18.272	
Phase 2	0.019	0.028	0.011	343.4	0.000	0.018 / 0.019	25.880	
Phase 3	0.013	0.161	0.019	334.8	0.002	0.011 / 0.012	26.535	
Phase 4	0.005	0.025	0.020	288.5	0.000	0.004 / 0.004	30.809	
Weighted	0.02957	0.21518	0.03237	354.278	0.00309	(NMOG=1.04xNMHC) 0.0267 / 0.0278		
<b>Fuel Economy</b>								
	<b>Gasoline MPG</b>	<b>Dyno Settings</b>						
Phase 1	18.25	Dyno #: D329 - AWD						
Phase 2	25.85	Inertia: 5500						
Phase 3	26.51	EPA Set Co A: -5.22						
Phase 4	30.78	EPA Set Co B: -0.1555						
		<b>1% SOC Limit</b>	<b>Act SOC A-hr</b>	<b>Sys Nom Volts</b>	<b>Charge State</b>	EPA Set Co C: 0.02786		
		0.6890	-0.4973	288.0	Pass			
Weighted	25.06	Emiss-Bench: Mexa 7200dle						

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2010-0330-008		Vehicle ID: VW526710023						
Test Date: 11/30/2010		MFR Name: VOLKSWAGEN						
Key Start: 13:48:11 / 09:39		MFR Codes: 590 VWX						
Fuel Container ID: F00023		Config #: 00						
Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO						
Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)		Shift Schedule: A09980005						
Calculation Method: Gasoline		Beginning Odometer: 004303.0 MI						
Pretest Remarks:		Drive Schedule: ftp4bag						
		Soak Period: 24.0 hours						
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / ml	Filter comment
<b>Phase 1</b>								
	A	7067560	140.9967	141.0337	0.03697	23.162	6.461	
	B	7067561	140.3475	140.3871	0.03957	24.804	6.919	
	C	7067562	142.2697	142.3113	0.04158	26.163	7.298	
Remarks:								
<b>Phase 2</b>								
	A	7067563	141.6238	141.6521	0.02826	17.656	4.597	
	B	7067564	141.7567	141.7878	0.03117	19.467	5.069	
	C	7067565	145.6394	145.6702	0.03078	19.242	5.010	
Remarks:								
<b>Phase 3</b>								
	A	7067566	142.8943	142.9275	0.03317	20.766	5.788	
	B	7067567	147.2771	147.3015	0.02437	15.294	4.263	
	C	7067568	149.0163	149.0414	0.02508	15.683	4.371	
Remarks:								
<b>Phase 4</b>								
	A	7067569	149.6534	149.6858	0.03239	20.214	5.260	
	B	7067570	146.9659	146.9992	0.03328	20.814	5.416	
	C	7067571	142.9747	142.9995	0.02476	15.600	4.060	
Remarks: <u>This test has particulate results.</u>								
<b>Average Results</b>					Net Wt mg	Total Mass mg	Total Mass mg / ml	
Phase 1					0.03937	24.710	6.893	
Phase 2					0.03007	18.789	4.892	
Phase 3					0.02754	17.248	4.807	
Phase 4					0.03014	18.876	4.912	
All filter weights are corrected for buoyancy.								
Weighted All Filters:							5.28987	
<b>Reference Filter Stability Check</b>				Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check PASS/FAIL	Dyno #: D329 - AWD Inertia: 5500
2% of Avg Net or 0.01 mg		No.						
0.01		1	145.74284	145.74809	0.00525	PASS	EPA Set Co A: -5.22	
		2	146.49367	146.49852	0.00485	PASS	EPA Set Co B: -0.1555	
								EPA Set Co C: 0.02786
Emissions Bench Mexa 7200dle								
v101007 - d329 EPAVDAEm101130125340				Page 1 of 2		Print Time 02-Dec-2010 12:23		

**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0330-008

Vehicle ID: VW526710023

<b>WEIGHING CHAMBER</b>		<b>Buoyancy</b>	<b>Operator</b>	<b>Chamber Temp</b>	<b>Dew Point</b>	<b>Barometer</b>	<b>Last Change in Status</b>
Timestamp		Factor	(Id)	(°F)	(°F)	(°Hg)	Status @ timestamp
<b>Pre-test</b>	11/30/10 10:20	1.0011021	021798	71.2	48.4	28.74	NORM @ 11/30/10 08:32:31
<b>Post-test</b>	12/1/10 10:43	1.0011044	022298	71.5	49.2	28.82	NORM @ 11/30/10 20:30:17

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.68	28.68	28.69	28.69
Avg Cell Temp (degF)	74.47	75.02	75.13	74.66
Dew Point (degF)	49.06	49.10	49.17	49.14
Specific Humidity (grains/lbm)	53.94	54.02	54.16	54.07
NOx Corr Factor	0.9099	0.9102	0.9108	0.9104
Dilution Factor	10.77	23.37	15.47	27.43
CFV Vmix (scf @68F)	2783.34	4769.22	2797.15	4768.51
Sample Volume A (scf @68F)	4.464	7.671	4.490	7.677
Sample Volume B (scf @68F)	4.462	7.672	4.479	7.662
Sample Volume C (scf @68F)	4.445	7.665	4.494	7.606
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	4.457	7.669	4.488	7.648
Total Vmix (scf @68F)	2796.71	4792.23	2810.61	4791.455301
Phase Time (sec)	506.90	869.60	509.70	869.59
Distance (miles)	3.585	3.841	3.588	3.843
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.4	41.1	41.3	41.3
PSU Dil Air B (degC)	43.7	43.3	43.3	43.3
PSU Dil Air C (degC)	40.2	40.0	40.1	40.1
PSU Filter A (degC)	45.5	47.5	45.6	45.5
PSU Filter B (degC)	47.0	46.1	45.6	47.4
PSU Filter C (degC)	44.2	44.0	44.3	44.9
PSU Dil Flow A (lpm)	29.9	30.0	29.9	30.0
PSU Dil Flow B (lpm)	29.9	30.0	29.9	30.0
PSU Dil Flow C (lpm)	30.0	30.0	29.9	30.0
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0330-008

Vehicle ID: VW526710023

## Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.353	2.715	0.325	1739.0	0.040	0.316	1.079
Phase 2	0.072	0.109	0.043	1319.1	0.001	0.071	
Phase 3	0.046	0.578	0.068	1201.1	0.007	0.040	
Phase 4	0.018	0.096	0.077	1108.7	0.002	0.017	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.68	28.68	28.69	28.69
Avg Cell Temp (degF)	74.47	75.02	75.13	74.66
Dew Point (degF)	49.06	49.10	49.17	49.14
Specific Humidity (grains/lbm)	53.94	54.02	54.16	54.07
NOx Corr Factor	0.9099	0.9102	0.9108	0.9104
CO2 Dilution Factor	10.770	23.374	15.471	27.43
CFV Vmix (scf @68F)	2783.34	4769.22	2797.15	4768.51
Total Vmix (scf@68F)	2796.71	4792.23	2810.61	4791.46
CVS Flow Rate Avg (scfm)	329.45	327.18	329.27	329.01

Fan Placement: One Fan - Down - Front

Phase Time (secs)	506.90	869.60	509.70	869.59
Distance (miles)	3.585	3.841	3.588	3.843
Bag Analysis Time (secs)	954.0	148.8	961.3	

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0232	0.471	0.0183	326	0	0.0211

Odometer  
3993 M

MPG  
27.2

MPG is 8.54 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 12/14/2010 6:27:03 PM  
**Subject:** FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Len

From: Kata, Leonard  
Sent: Friday, December 10, 2010 7:57 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Lothar Rech from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.



Please let me know what you think.

Regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Tue 12/14/2010 6:47:14 PM  
**Subject:** RE: FW: Confernece Call - Audi

Hi Jim:

I just wrote back and tried to recall the message. I read your message too fast.

Next Monday at 10:00 sounds good. I will let Lothar know.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, December 14, 2010 1:35 PM  
To: Kata, Leonard  
Subject: Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Kata, Leonard" <Leonard.Kata@vw.com>  
  
To:  
Jim Snyder/AA/USEPA/US@EPA  
  
Date:  
12/14/2010 01:27 PM  
  
Subject:  
FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Len

From: Kata, Leonard  
Sent: Friday, December 10, 2010 7:57 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi.  
Lothar Rech from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 12/14/2010 7:40:35 PM  
**Subject:** Certificate for MY 2012 Test Group CVWXV02.5259

Hello Jim,

I received a message on Friday that the certificate for MY 2012 Test Group CVWXV02.5259 was waiting to be signed.

Is there any reason it hasn't been signed yet?

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Wed 12/15/2010 4:02:51 PM  
**Subject:** Accepted: Audi phone conference: Start/stop and manual trans

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]  
**From:** "Kata, Leonard"  
**Sent:** Wed 12/15/2010 4:07:17 PM  
**Subject:** EPA/AUDI Conference Call

Hi Jim:

The e-gremlins must be active today. I sent an outlook invitation to you with a call-in number for our conference call on Monday (12/20) at 10:00. I keep getting an "undeliverable" message back, but the e-mail is in my sent items folder.

So... just in case, the following is the information for the call-in. Please use the Dial-In and the Participant Code below.

Audio Conference Information:

**Non-Responsive**

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 12/15/2010 4:17:30 PM  
**Subject:** VW Group: MY 2012 Test Waiver Requests

Hello Jim,

I just submitted two more MY 2012 test waiver requests. I expect to submit two more by the end of the day if possible.

The first four were for two FEDV's (automatic and manual transmission versions) for test group CVWXV02.5U35 – federal only BIN 5 new midsize sedan (NMS ).

This is a new model to be produced at VW's new factory in Tennessee.

The two from today and the two yet to be submitted are a PZEV version of the same vehicle.

These are all fuel economy tests for the first two test group applications that I have already submitted for certification.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Willem VandenBroek/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/6/2011 2:29:59 PM  
**Subject:** CVWXV02.03SA and CVWXV02.03PA

Richard,

You should have received an automated email a few days ago saying that EPA had received payment for the Subject families at \$33,974 each. When we received the forms we charged them against the ACH payment for \$69,992 received from VW on 12/17/2010. (The forms for the remainder of that payment were filed from Germany). All that appears to be in order.

However, we noticed that the applications for these two families were filed in Calendar Year 2010. The fee is determined by the calendar year of the application (as stated at the top of the form), which, for applications received in calendar 2010, is \$34,849. Consequently, these two families have been designated as Short, On Hold, until the \$875 each has been received, upon which they will be listed as paid and cleared for certification review.

Let me know if you have any questions.

Bill Vanden Broek  
734-214-4468

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/24/2011 6:59:45 PM  
**Subject:** 2011 FE Guide - data attached as sent to DOE for January 2011 web update - Please review & correct any errors in EPA's Verify database  
[VW 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx](#)  
[Audi 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx](#)  
[Bentley 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx](#)  
[Bugatti 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx](#)  
[Lamborghini 2011FEGuide1-all rel-dates-w-sales-01-10-2011.xlsx](#)

Richard,

Attached are Excel Spreadsheet(s) with the data that I sent to DOE on Jan 19, 2011 to update [www.fueleconomy.gov](http://www.fueleconomy.gov) (except that any model types highlighted in green filler were not sent to DOE). DOE anticipates updating the web the week of Jan 24th.

The attached spreadsheet(s) contain all the 2011 FE label data from EPA's Verify data base as of January 10, 2010. Please review the spreadsheet(s) and confirm for your records that the data are correct. Any corrections should be made directly in the EPA Verify database.

If there are any model types highlighted in green filler in the attached spreadsheet(s)---please correct the data in Verify and let me know that the corrections have been made (so I can forward the data to DOE for web posting).

As usual, please let me know if you find any other problems or errors in the data.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 2/14/2011 9:07:59 PM  
**Subject:** Volkswagen Application for Emissions Certification - Test group CVWXV06.3UA8

Hello Jim,

Just a heads up that we have submitted the application for the above listed test group. This is a new test group. Confirmatory tests were waived and no manufacturer retests were required.

Please let me know if you have any questions about this submission.

Regards

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Thur 3/3/2011 3:47:17 PM  
**Subject:** VW Request for Approval - SCR and AECD

Hello Jim:

In mid-February I submitted a document that describes the SCR system in the 2012 New Passat with 2.0L TDI Diesel. The document also contains information about AECDs for this engine concept. This is the mid-size sedan vehicle that will be produced beginning in late April in the new plant in Chattanooga, TN.

I was wondering whether you have had a chance to look at the information and if you find it acceptable or have further questions or concerns.

Please let me know.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 3/8/2011 7:56:33 PM  
**Subject:** VW Group Decision Information submissions for TG: CVWXV02.03PA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

We submitted today two Decision Information data sets for test group CVWXV02.03PA. These are related to a forthcoming Running Change to add the Jetta model to this existing Bin 3/ SULEV (PZEV) test group.

No new technology is included with this model. The manual transmission configuration does require a HWY retest do to high fuel economy for the ETW.

Vehicle ID: VW361 00464 (Jetta manual trans)  
VW465 00127 (Jetta automatic trans)

Best regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** "[redacted]@ford.com]; ill Pagels  
[bill.pagels@meidenamerica.com]; ob Maxwell [remaxwell@comcast.net]; hris  
Nevers/AA/USEPA/US@EPA; [redacted]@gm.com]; [redacted]  
[redacted]@gm.com]; [redacted]@na.mitsubishi-motors.com]; [redacted]  
[redacted]@na.mitsubishi-motors.com]; [redacted]@anl.gov]; [redacted]  
[redacted]@chrysler.com]; [redacted]@chrysler.com]; im  
Snyder/AA/USEPA/US@EPA; [redacted]@bepco.com]; [redacted]  
[Keith.Thompson@bepco.com]; ent Theil [okt@chrysler.com]; kyle.bedsale@gm.com"  
[redacted]@gm.com]; [redacted]@chrysler.com]; [redacted]  
[redacted]@tc.gc.ca]; [redacted]@ganassi.com]; [redacted]@sae.org"  
[redacted]@sae.org]; [redacted]@tc.gc.ca]; [redacted] (N.)"  
[redacted]@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov"  
['Paulina.Carl@epamail.epa.gov]; [redacted]@ford.com];  
[redacted]@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com];  
[redacted]@ahm.honda.com" [redacted]@ahm.honda.com]; [redacted]  
[redacted]@nrd.nissan-usa.com]; [redacted]  
Schrodt/AA/USEPA/US@EPA; [redacted]@tema.toyota.com"  
[redacted]@tema.toyota.com']; [redacted]@tema.toyota.com"  
[redacted]@tema.toyota.com']; [redacted]@ahm.honda.com"  
[redacted]@ahm.honda.com']; [redacted]  
[redacted]@tema.toyota.com]

**From:** "Glodich, Jeffrey (J.M.)"  
**Sent:** Fri 1/20/2012 6:35:58 PM  
**Subject:** J2951 Phase II Review

**Purpose:**

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

**Meeting Info:**

**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com>>

**Ex. 6**



**To:** "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels' [bill.pagels@meidenamerica.com]; 'Bob Maxwell' [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave Kosmalski' [david.kosmalski@gm.com]; 'Dennis Pawlak' [Dennis.Pawlak@na.mitsubishi-motors.com]; 'Douglas Reid' [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike' [mduoba@anl.gov]; 'Jeff Foor' [jdf14@chrysler.com]; 'Jim Smith' [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"Keith Thompson" [Keith.Thompson@bepco.com]; 'Keith Thompson' [Keith.Thompson@bepco.com]; 'Kent Theil' [okt@chrysler.com]; 'kyle.bedsole@gm.com' [kyle.bedsole@gm.com]; 'Mahmoud Yassine' [mky@chrysler.com]; 'Marc Belzile' [marc.a.belzile@tc.gc.ca]; 'mark paxton' [mpaxton@ganassi.com]; 'MBrussow@sae.org' [MBrussow@sae.org]; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.) [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov' [Paulina.Carl@epamail.epa.gov]; Peabody, Jason (J.A.) [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com" [takashi\_a\_fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"tom.beierschmitt@tema.toyota.com" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com' ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com' ['tommy\_chang@ahm.honda.com']; 'William Meschievitz' [william.meschievitz@tema.toyota.com]; Khan, Farrukh" [KhanF@NRD.NISSAN-USA.COM]

**Cc:** Carl Paulina/AA/USEPA/US@EPA[]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Thur 2/23/2012 5:18:39 PM

**Subject:** Rescheduled: J2951 Phase II Review (Mar 22 01:00 PM EDT in Toyota, Ann Arbor)

Rescheduled due to conflicts.

Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com>>

**Ex. 6**

**To:** "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels' [bill.pagels@meidenamerica.com]; 'Bob Maxwell' [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave Kosmalski' [david.kosmalski@gm.com]; 'Dennis Pawlak' [Dennis.Pawlak@na.mitsubishi-motors.com]; 'Douglas Reid' [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike' [mduoba@anl.gov]; 'Jeff Foor' [jdf14@chrysler.com]; 'Jim Smith' [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"Keith Thompson" [Keith.Thompson@bepco.com]; 'Keith Thompson' [Keith.Thompson@bepco.com]; 'Kent Theil' [okt@chrysler.com]; 'kyle.bedsole@gm.com' [kyle.bedsole@gm.com]; 'Mahmoud Yassine' [mky@chrysler.com]; 'Marc Belzile' [marc.a.belzile@tc.gc.ca]; 'mark paxton' [mpaxton@ganassi.com]; 'MBrussow@sae.org' [MBrussow@sae.org]; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.) [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov' [Paulina.Carl@epamail.epa.gov]; Peabody, Jason (J.A.) [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com' [takashi\_a\_fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"tom.beierschmitt@tema.toyota.com" [tom.beierschmitt@tema.toyota.com]; 'tom.beierschmitt@tema.toyota.com' [tom.beierschmitt@tema.toyota.com]; 'tommy\_chang@ahm.honda.com' [tommy\_chang@ahm.honda.com]; 'William Meschievitz' [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh' [KhanF@NRD.NISSAN-USA.COM]

**Cc:** Carl Paulina/AA/USEPA/US@EPA;Jeff Foor [j.foor@chrysler.com]; eff Foor [j.foor@chrysler.com]; im Snyder/AA/USEPA/US@EPA[]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Wed 3/21/2012 11:51:34 AM

**Subject:** Cancelled: J2951 Phase II Review

Cancelled for this month only due to JSAE meeting.

Rescheduled due to conflicts.

Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com>>

**Ex. 6**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 4/4/2012 2:54:47 PM  
**Subject:** Accepted: VW Group - Audi A8 w/Start/Stop and Cyl Deactivation Test Drive

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Wed 4/4/2012 4:49:02 PM  
**Subject:** Tentative: VW Group - Audi A8 w/Start/Stop and Cyl Deactivation Test Drive

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Kata, Leonard"  
[Leonard.Kata@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 4/16/2012 5:58:34 PM  
**Subject:** VW Group - Request for AECD Approval  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted to Verify two 2013 AECD approval requests for the following test groups. Please contact Len Kata or myself if you have any questions about these requests.

DVWXV02.0U5N – TDI (non-SCR)

DVWXV02.0U4S – TDI with SCR

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels' [bill.pagels@meidenamerica.com]; 'Bob Maxwell' [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave Kosmalski' [david.kosmalski@gm.com]; 'Dennis Pawlak' [Dennis.Pawlak@na.mitsubishi-motors.com]; 'Douglas Reid' [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike' [mduoba@anl.gov]; 'Jeff Foor' [jdf14@chrysler.com]; 'Jim Smith' [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"Keith Thompson" [Keith.Thompson@bepco.com]; 'Keith Thompson' [Keith.Thompson@bepco.com]; 'Kent Theil' [okt@chrysler.com]; 'kyle.bedsole@gm.com' [kyle.bedsole@gm.com]; 'Mahmoud Yassine' [mky@chrysler.com]; 'Marc Belzile' [marc.a.belzile@tc.gc.ca]; 'mark paxton' [mpaxton@ganassi.com]; 'MBrussow@sae.org' [MBrussow@sae.org]; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.) [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov' [Paulina.Carl@epamail.epa.gov]; Peabody, Jason (J.A.) [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com' [takashi\_a\_fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodt/AA/USEPA/US@EPA;"tom.beierschmitt@tema.toyota.com" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com' ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com' ['tommy\_chang@ahm.honda.com']; 'William Meschievitz' [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh' [KhanF@NRD.NISSAN-USA.COM]

**Cc:** Carl Paulina/AA/USEPA/US@EPA[]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Tue 4/17/2012 6:00:44 PM

**Subject:** Cancelled: J2951 Phase II Review

**Purpose:**

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

**Meeting Info:**

**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com>>

**Ex. 6**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Thur 4/19/2012 5:59:45 PM  
**Subject:** Accepted: VW Group - Audi A8 w/Start/Stop and Cyl Deactivation Test Drive



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Fri 4/20/2012 1:22:03 PM  
**Subject:** Audi Start-Stop Demo

Hello Jim:

Hope all is well with you.

I was speaking with my Audi colleagues on Wednesday and they asked about the Audi start-stop demo drive that we have scheduled with EPA for early May. They asked if EPA has any particular topics or questions that they should be prepared to address. My understanding was that EPA staff mainly wanted a chance to drive the car. I suggested that they have a 2-3 slide overview just as a refresher.

Just so we can be appropriately prepared, are you expecting any more detailed discussion?

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 4/23/2012 7:37:38 PM  
**Subject:** VW Group - Decision Information Tiguan 4Motion

Hello Jim,

We have submitted vehicle information, test results and decision requests for the following:

MY 2013 Test Group DVWXJ02.03UA

Vehicle ID VW316 20145 (config. 0 & 1, see below)

Carline: Tiguan 4Motion carline

Configuration 0: (New worst case EDV) – with updated TCM software

Configuration 1: (FEDV with low roll tires) – with updated TCM software

We have not yet submitted a RC letter but would appreciate if you could notify us with decision information at your earliest convenience.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Wed 5/2/2012 7:02:45 PM  
**Subject:** VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DAD XV04.23UL, evaporative family DAD XR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

This is a new test group with a new EDV and a carryover evaporative family.

Please proceed with your review and let me know if you have any questions.

Regards,

Mike

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Wed 5/2/2012 7:11:33 PM  
**Subject:** RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

One detail I forgot to mention – the RS5 has short timing for us, so any priority you can give would be highly appreciated.

Thanks,

Mike

From: Giles, Michael  
Sent: Wednesday, May 02, 2012 3:03 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DAD XV04.23UL, evaporative family DAD XR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Wed 5/2/2012 8:25:56 PM  
**Subject:** RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)

Hi Jim,

It should be there now – I submitted the request too soon after the application (VERIFY took longer to process the application so it rejected my first request).

Thanks

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, May 02, 2012 4:02 PM  
To: Giles, Michael  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

I don't see it in Verify.  
Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/02/2012 03:12 PM  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

One detail I forgot to mention – the RS5 has short timing for us, so any priority you can give would be

highly appreciated.

Thanks,  
Mike

From: Giles, Michael  
Sent: Wednesday, May 02, 2012 3:03 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DAD XV04.23UL, evaporative family DAD XR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

This is a new test group with a new EDV and a carryover evaporative family.

Please proceed with your review and let me know if you have any questions.

Regards,  
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Michael Giles  
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Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA;"Nagel, Carsten (N/EA-521)"  
[Carsten.Nagel@audi.de]; Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de];  
Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]  
**From:** "Kata, Leonard"  
**Sent:** Mon 5/7/2012 12:42:01 PM  
**Subject:** Audi Start-Stop Meeting

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).  
Where: EPA Conference Room

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Hello Jim:

Last week, I reported the names of the participants for the Audi Start-Stop system meeting and demo drive. Unfortunately, Mr. Kissling will not be attending in person. If possible, we would like to connect with some of our colleagues in Germany by telephone.

Therefore, I have arranged a conference call-in number. I would appreciate it if there is a speaker telephone available in the conference room.

This invitation is merely to set up the call-in number.

Best regards,

Len

**To:** "Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de]; Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 5/7/2012 1:05:45 PM  
**Subject:** Audi Start Stop Demo.

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).  
Where: EPA Conference Room C126

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Hello Jim:

I am resending because the conference call number did not appear (operator error??). I hope that it works this time.

This is a call-in number for the Audi Start-Stop demo and discussion.

Best regards,

Len

You have been invited to attend a conference call. Please accept or reject. Details are below.

Audio Conference Information:

**Ex. 6**

**To:** "Nagel, Carsten (N/EA-521)" [Carsten.Nagel@audi.de]; Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard"  
**Sent:** Mon 5/7/2012 1:05:44 PM  
**Subject:** Update: Audi Start Stop Demo.

When: Tuesday, May 08, 2012 1:00 PM-2:00 PM (GMT-05:00) Eastern Time (US & Canada).  
Where: EPA Conference Room C126

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Hello Jim:

I am resending because the conference call number did not appear (operator error??). I hope that it works this time.

This is a call-in number for the Audi Start-Stop demo and discussion.

Best regards,

Len

You have been invited to attend a conference call. Please accept or reject. Details are below.

Audio Conference Information:

**Ex. 6**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 5/7/2012 4:48:29 PM  
**Subject:** VW Group - Cert Request for Audi Test Group DADXV02.53UK (TTRS)

Hello Jim,

FYI, we just submitted a certification request for the above test group (Audi TTRS).

Note, this is a carryover test group with no new tests or models. Please let me know if you have any questions about this.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Mon 5/7/2012 8:33:03 PM  
**Subject:** RE: audi testing  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Jim

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, May 07, 2012 4:22 PM  
To: Giles, Michael  
Subject: audi testing

The Audi 3.0L is indeed ready for testing tomorrow, with S/Stop disabled. I couldn't find out when it will test so best recommendation is to show up at 7:00.  
The evap test result was .50g. Results should show up tomorrow in Verify.

The 4.0L is here and scheduled for wednesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/07/2012 12:48 PM  
Subject: VW Group - Cert Request for Audi Test Group DADXV02.53UK (TTRS)

Hello Jim,

FYI, we just submitted a certification request for the above test group (Audi TTRS).

Note, this is a carryover test group with no new tests or models. Please let me know if you have any questions about this.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 5/9/2012 12:17:37 PM  
**Subject:** RE: VW Group - Request for AECD Approval  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim.

I was out of the office for a couple weeks dealing with a death in the family.

I'm back now but please continue dealing with Mike or Len on current issues. Feel free to contact me if you can't reach them.

Thanks Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, May 04, 2012 4:07 PM  
To: Rodgers, William  
Subject: Re: VW Group - Request for AECD Approval

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Kata, Leonard" <Leonard.Kata@vw.com>  
Date: 04/16/2012 01:59 PM  
Subject: VW Group - Request for AECD Approval

Hello Jim,

I have submitted to Verify two 2013 AECD approval requests for the following test groups. Please contact Len Kata or myself if you have any questions about these requests.

DVWXV02.0U5N – TDI (non-SCR)

DVWXV02.0U4S – TDI with SCR

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 5/9/2012 2:15:52 PM  
**Subject:** Audi stop start follow up

Hello Jim,

I left a voice message, but to clarify:

- The Audi cert team still has the 4.0L demo car in Ann Arbor, with a correction for the start/stop mode setting problem after key-off. Please let us know if you would like to have a look at this; It uses the same SW as the 3.0L and this software is not emissions related as it is part of a body control unit (not ECM).
  
- Please let us know if there are any issues with respect to the validation of the 3.0L test results because of the above issue.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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Auburn Hills, MI 48326

United States of America

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/10/2012 6:17:02 PM  
**Subject:** VW Group - VID D3UF-DAQ Audi A8 3.0T  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We are finished with testing the Audi A8 3.0L, VID D3UF-DAQ currently at your facility. Please release it for pick up on Friday May11th.

Regards,

Bill Rodgers

Emissions Certification Engineer

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Auburn Hills, MI 48436

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fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/10/2012 6:21:21 PM  
**Subject:** Audi test results  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

Bill Rodgers

Emissions Certification Engineer

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Auburn Hills, MI 48436

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 5/11/2012 11:23:25 AM  
**Subject:** Re: Audi test results  
[D3UJ-DAQ 5-9-12.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.  
If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 05/10/2012 02:21 PM  
**Subject:** Audi test results

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

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cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0176-003			Vehicle ID: D3UJ-DAQ				
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 45%;"> <b>Test Information</b>            Test Date: 5/9/2012            Key Start / Hot Soak: 10:37:27 / 09:42            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 40%;">           MFR Name: AUDI            MFR Codes: 640            Config #: 00            Transmission: S            Shift Schedule: A09980005            Beginning Odometer: 004579.0 MI            Drive Schedule: ftp3bag            Soak Period: 20.4 hours         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	13.582	168.074	0.732	1.227	5.149		
Ambient	2.231	0.740	0.012	0.044	1.980		
Net Concentration	11.559	167.403	0.721	1.188	3.354	7.913	
Remarks:							
<b>Phase 2</b>							
Sample	2.254	0.562	0.102	0.819	1.851		
Ambient	2.176	0.082	0.006	0.043	1.978		
Net Concentration	0.211	0.485	0.097	0.778	-0.005	0.211	
Remarks:							
<b>Phase 3</b>							
Sample	2.120	1.005	0.179	1.038	1.913		
Ambient	2.138	0.052	0.005	0.043	1.960		
Net Concentration	0.147	0.957	0.175	0.998	0.105	0.033	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: This test has particulate results.							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.149	4.367	0.028	486.8	0.050	0.102 / 0.106	18.061
Phase 2	0.004	0.020	0.006	507.7	0.000	0.004 / 0.005	17.578
Phase 3	0.002	0.025	0.007	407.9	0.002	0.000 / 0.000	21.878
Weighted	0.03373	0.92261	0.01077	475.950	0.01082	(NMOG=1.04xNMHC) 0.0236 / 0.0245	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	18.02	Dyno #: D329 - AWD					
Phase 2	17.54	Inertia: 5000					
Phase 3	21.83	EPA Set Co A: -6.32					
		EPA Set Co B: 0.2344					
		EPA Set Co C: 0.01488					
Weighted	18.65	Emiss-Bench: Mexa 7200dle					

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0176-003				Vehicle ID: D3UJ-DAQ			
<b>Results</b>	<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NMHC</b>	<b>Meth Response</b>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.534	15.625	0.100	1741.9	0.179	0.366	1.087
Phase 2	0.017	0.077	0.023	1951.5	0.000	0.017	
Phase 3	0.007	0.089	0.024	1461.1	0.006	0.002	



Test Conditions	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.86	28.86	28.86	
Avg Cell Temp (degF)	72.36	72.32	72.14	
Dew Point (degF)	48.97	48.76	49.11	
Specific Humidity (grains/lbm)	53.40	52.98	53.69	
NOx Corr Factor	0.9078	0.9062	0.9090	
CO2 Dilution Factor	10.758	16.360	12.910	
CFV Vmix (scf @68F)	2808.81	4803.12	2803.33	
Total Vmix (scf @68F)	2831.05	4841.40	2825.63	
CVS Flow Rate Avg (scfm)	332.08	331.21	331.36	
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	507.51	870.10	507.60	
Distance (miles)	3.578	3.844	3.582	
Bag Analysis Time (secs)	1003.8	247.1	141.9	

**MFR Test Results** for Procedure 21 Federal fuel 2-day exhaust (w/can load)

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0178	0.254	0.026	442	0	0.0132

Odometer  
4456 M

MPG  
20.1

MPG is 7.79 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

v120405 - d329 EPAVDAEm120509101820
Page 2 of 2
Print Time 10-May-2012 15:07

# NVFEL Laboratory Test Data

## PARTICULATE

### Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0176-003

Vehicle ID: D3UJ-DAQ

#### Test Information



Test Date: 5/9/2012

Key Start: 10:37:27 / 09:42

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Calculation Method: Gasoline

Pretest Remarks:

MFR Name AUDI

MFR Codes: 640

ADX

Config #: 00

Transmission: S

Shift Schedule: A09980005

Beginning Odometer: 004579.0 MI

Drive Schedule: ftp3bag

Soak Period: 20.4 hours

All filter weights are corrected for buoyancy.

Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<b>Phase 1</b>	A	706728	147.8716	147.9064	0.03474	13.217	3.694	
	B	706731	145.9229	145.9582	0.03534	13.463	3.763	
	C	706734	145.2991	145.3427	0.04365	16.764	4.685	

Remarks:

<b>Phase 2</b>	A	706729	145.8620	145.8794	0.01742	6.605	1.718	
	B	706732	146.3159	146.3361	0.02022	7.669	1.995	
	C	706735	145.5808	145.6044	0.02362	8.968	2.333	

Remarks:

<b>Phase 3</b>	A	706730	147.8957	147.9305	0.03474	13.195	3.684	
	B	706733	147.8753	147.8940	0.01872	7.109	1.985	
	C	706736	144.1243	144.1443	0.02002	7.629	2.130	

Remarks:

#### Phase 4

Remarks: This test has particulate results.

#### Average Results

	Net Wt mg	Total Mass mg	Total Mass mg / mi
Phase 1	0.03791	14.481	4.047
Phase 2	0.02042	7.747	2.016
Phase 3	0.02449	9.311	2.600

All filter weights are corrected for buoyancy.

Weighted All Filters:

2.59741

#### Reference Filter Stability Check

2% of Avg Net or 0.01 mg	No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - AWD
0.01	1	144.64335	144.64416	0.00081	PASS/FAIL	Inertia: 5000
	2	143.27654	143.27565	-0.00089	PASS	EPA Set Co A: -6.32
					PASS	EPA Set Co B: 0.2344
						EPA Set Co C: 0.01488

Emissions Bench Mexa 7200dle



**NVFEL Laboratory Test Data****PARTICULATE****Final Laboratory Test Results- Refer to VERIFY Reports for Official Data**  
Test Number: 2012-0176-003


Vehicle ID: D3UJ-DAQ

Test Number: 2012-0770-000					Vehicle ID: D303-DAQ		
WEIGHING CHAMBER		Buoyancy	Operator	Chamber Temp	Dew Point	Barometer	Last Change in Status
	Timestamp	Factor	(Id)	(°F)	(°F)	(°Hg)	Status @ timestamp
Pre-test	5/8/12 13:06	1.0011050	022298	71.7	49.2	28.85	NORM @ 05/07/12 14:51:29
Post-test	5/9/12 12:58	1.0011050	022298	71.6	49.1	28.84	NORM @ 05/07/12 14:51:29

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (InHg)	28.86	28.86	28.86	
Avg Cell Temp (degF)	72.36	72.32	72.14	
Dew Point (degF)	48.97	48.76	49.11	
Specific Humidity (grains/lbm)	53.40	52.98	53.69	
NOx Corr Factor	0.9078	0.9062	0.9090	
Dilution Factor	10.76	16.36	12.91	
CFV Vmix (scf @68F)	2808.81	4803.12	2803.33	
Sample Volume A (scf @68F)	7.440	12.767	7.438	
Sample Volume B (scf @68F)	7.431	12.764	7.440	
Sample Volume C (scf @68F)	7.371	12.754	7.415	
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	7.414	12.762	7.431	
Total Vmix (scf @68F)	2831.05	4841.40	2825.63	
Phase Time (sec)	507.51	870.10	507.60	
Distance (miles)	3.578	3.844	3.582	
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	44.5	42.5	41.5	
PSU Dil Air B (degC)	44.8	44.5	43.6	
PSU Dil Air C (degC)	43.8	42.9	41.8	
PSU Filter A (degC)	45.8	46.2	46.3	
PSU Filter B (degC)	47.7	47.3	48.0	
PSU Filter C (degC)	45.6	45.4	45.2	
PSU Dil Flow A (lpm)	29.9	29.9	29.9	
PSU Dil Flow B (lpm)	29.9	29.9	29.9	
PSU Dil Flow C (lpm)	30.0	29.9	29.9	
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0176-002		Vehicle ID: D3UJ-DAQ					
	Test Date: 5/9/2012		MFR Name: AUDI				
	Key Start: 12:34:14		MFR Codes: 640 ADX				
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S				
	Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011				
	Calculation Method: Gasoline		Beginning Odometer: 004610.0 MI				
Pretest Remarks:		Drive Schedule: hwfet_hwfet					
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample		3.369	4.485	0.115	0.893	2.334	
Ambient		2.245	0.079	0.000	0.050	1.963	
Net Concentration		1.274	4.412	0.115	0.846	0.502	0.728
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.012	0.087	0.003	262.3	0.006	0.007 / 0.007
							34.004
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>			<u>Dyno Settings</u>		Dyno #: D329 - AWD
Phase 1		33.93					Inertia: 5000
							EPA Set Co A: -6.32
							EPA Set Co B: 0.2344
							EPA Set Co C: 0.01488
							Emiss-Bench: Mexa 7200die
v120405 - d329 EPAVDAEm120509120755							
Page 1 of 2							
Print Time 10-May-2012 15:00							

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0176-002

Vehicle ID: D3UJ-DAQ

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.128	0.892	0.035	2687.9	0.058	0.073	1.087

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.86			
Avg Cell Temp (degF)	72.20			
Dew Point (degF)	48.93			
Specific Humidity (grains/lbm)	53.33			
NOx Corr Factor	0.9076			
CO2 Dilution Factor	14.987			
CFV Vmix (scf @68F)	6130.24			

CVS Flow Rate Avg (scfm) 480.74

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.10
Distance (miles)	10.247
Bag Analysis Time (secs)	126.0

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0017	0.013	0.004	256	0	0.0009

Odometer  
4467 M

MPG  
34.7


MPG is 2.28 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Information				Vehicle ID: D3UJ-DAQ			
	Test Date: 5/9/2012		MFR Name: AUDI				
	Key Start: 13:45:06		MFR Codes: 640		ADX		
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S				
	Test Procedure: 90 US06 (us06warmup_us06)		Shift Schedule: A09980041				
	Calculation Method: Gasoline		Beginning Odometer: 004630.0 MI				
Pretest Remarks:				Drive Schedule: us06_us06			
<b>Baq Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>							
Sample		3.700	6.568	0.403	1.208	2.287	
Ambient		2.528	0.082	0.008	0.043	1.949	
Net Concentration		1.400	6.493	0.396	1.169	0.513	0.842
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
Remarks: This test has particulate results.							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.016	0.151	0.014	427.9	0.007	0.010 / 0.010
							20.846
		(NMOG=1.04xNMHC)					
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>			<u>Dyno Settings</u>	<u>Dyno #:</u> D329 - AWD	
Phase 1		20.80					Inertia: 5000
							EPA Set Co A: -6.32
							EPA Set Co B: 0.2344
							EPA Set Co C: 0.01488
							Emiss-Bench: Mexa 7200dle
v120405 - d329 EPAVDAEm120509131817 Page 1 of 2 Print Time 10-May-2012 14:59							

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data  
Test Number: 2012-0176-001

Vehicle ID: D3UJ-DAQ

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.129	1.209	0.110	3422.8	0.055	0.078	1.087

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (InHg)	28.84			
Avg Cell Temp (degF)	72.27			
Dew Point (degF)	48.86			
Specific Humidity (grains/lbm)	53.22			
NOx Corr Factor	0.9071			
CO2 Dilution Factor	11.082			
CFV Vmix (scf @68F)	5623.12			
Total Vmix (scf@68F)	5649.30			
CVS Flow Rate Avg (scfm)	560.16			

Fan Placement: US06 Only - One Large Fan - Up - Front

Phase Time (secs)	602.30
Distance (miles)	8.000
Bag Analysis Time (secs)	136.1

## MFR Test Results

for Procedure 90 US06

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.011	0.077	0.015	373	0	0.0063

<u>Odometer</u>	<u>MPG</u>
4489 M	23.8

MPG is 14.43 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7  
Fuel: 61 Tier 2 Cert Gasoline

# NVFEL Laboratory Test Data

PARTICULATE

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0176-001

Vehicle ID: D3UJ-DAQ

## Test Information



Test Date: 5/9/2012  
Key Start: 13:45:06  
Fuel Container ID: F00023  
Fuel Type: 61 Tier 2 Cert Test Fuel  
Test Procedure: 90 US06 (us06warmup\_us06)  
Calculation Method: Gasoline  
Pretest Remarks:

MFR Name: AUDI  
MFR Codes: 640  
Config #: 00  
Transmission: S  
Shift Schedule: A09980041  
Beginning Odometer: 004630.0 MI  
Drive Schedule: us06\_us06

All filter weights are corrected for buoyancy.

Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / ml	Filter comment
Phase 1	A	416748	143.7033	143.7681	0.06469	41.796	5.224	
	B	416749	146.0568	146.0997	0.04277	27.607	3.451	
	C	416750	143.2798	143.3407	0.06089	39.620	4.953	

Remarks:

## Phase 2

Remarks:

## Phase 3

Remarks:

## Phase 4

Remarks: This test has particulate results.

## Average Results

	Net Wt mg	Total Mass mg	Total Mass mg / ml
Phase 1	0.05612	36.341	4.543

All filter weights are corrected for buoyancy.

## Reference Filter Stability Check

2% of Avg Net or 0.01 mg	No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - AWD
0.01	1	144.64406	144.64707	0.00301	PASS/FAIL	Inertia: 5000
	2	143.27515	143.27655	0.00141	PASS	EPA Set Co A: -6.32
					PASS	EPA Set Co B: 0.2344
						EPA Set Co C: 0.01488

Emissions Bench Mexa 7200dle


**NVFEL Laboratory Test Data****PARTICULATE**Final Laboratory Test Results- Refer to VERIFY Reports for Official Data  
Test Number: 2012-0176-001

Vehicle ID: D3UJ-DAQ

<b>WEIGHING CHAMBER</b>		<u>Buoyancy</u>	<u>Operator</u>	<u>Chamber Temp</u>	<u>Dew Point</u>	<u>Barometer</u>	<u>Last Change in Status</u>
	Timestamp	Factor	(Id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b>	5/9/12 9:35	1.0011050	022298	71.7	49.2	28.85	NORM @ 05/07/12 14:51:29
<b>Post-test</b>	5/10/12 9:50	1.0011092	022298	72	49.7	28.98	NORM @ 05/10/12 08:53:46

<u>Test Conditions</u>	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.84			
Avg Cell Temp (degF)	72.27			
Dew Point (degF)	48.86			
Specific Humidity (grains/lbm)	53.22			
NOx Corr Factor	0.9071			
Dilution Factor	11.08			
CFV Vmix (scf @68F)	5623.12			
Sample Volume A (scf @68F)	8.744			
Sample Volume B (scf @68F)	8.753			
Sample Volume C (scf @68F)	8.681			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	8.726			
Total Vmix (scf @68F)	5649.30			
Phase Time (sec)	602.30			
Distance (miles)	8.000			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.7			
PSU Dil Air B (degC)	43.6			
PSU Dil Air C (degC)	41.9			
PSU Filter A (degC)	45.6			
PSU Filter B (degC)	47.0			
PSU Filter C (degC)	44.7			
PSU Dil Flow A (lpm)	29.6			
PSU Dil Flow B (lpm)	29.6			
PSU Dil Flow C (lpm)	29.6			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0176-004				Vehicle ID: D3UJ-DAQ			
		Test Date: 5/9/2012		MFR Name: AUDI			
		Key Start: 14:23:43		MFR Codes: 640		ADX	
		Fuel Container ID: F00023		Config #: 00			
		Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S			
		Test Procedure: 89 us062bag (us06warmup_2bagus06)		Shift Schedule: A09980041			
		Calculation Method: Gasoline		Beginning Odometer: 004646.0 MI			
Pretest Remarks:				Drive Schedule: us06warmup_2bagus06			
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	2.803	4.157	0.370	1.114	2.191		
Ambient	1.871	0.070	0.006	0.043	1.937		
Net Concentration	1.089	4.092	0.365	1.075	0.415	0.638	
Remarks:							
<b>Phase 2</b>							
Sample	2.462	4.306	0.238	1.224	2.085		
Ambient	1.848	0.063	0.006	0.043	1.941		
Net Concentration	0.783	4.249	0.232	1.185	0.322	0.434	
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.022	0.170	0.023	700.7	0.010	0.013 / 0.014	12.731
Phase 2	0.007	0.076	0.006	334.7	0.003	0.004 / 0.004	26.658
Composite	0.01036	0.09693	0.00984	415.272	0.00476	(NMOG=1.04xNMHC) 0.0059 / 0.0061	
<b>Fuel Economy</b>	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	12.70	Dyno #: D329 - AWD					
Phase 2	26.60	Inertia: 5000					
		EPA Set Co A: -6.32					
		EPA Set Co B: 0.2344					
		EPA Set Co C: 0.01488					
Composite	21.45	Emiss-Bench: Mexa 7200dle					



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0176-004

Vehicle ID: D3UJ-DAQ

### Results

	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.039	0.299	0.040	1233.0	0.017	0.023	1.087
Phase 2	0.043	0.476	0.039	2085.6	0.021	0.024	



### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.84	28.84		
Avg Cell Temp (degF)	72.11	72.01		
Dew Point (degF)	49.17	48.99		
Specific Humidity (grains/lbm)	53.87	53.50		
NOx Corr Factor	0.9097	0.9082		
CO2 Dilution Factor	12.018	10.946		
CFV Vmix (scf @68F)	2213.55	3397.92		

CVS Flow Rate Avg (scfm) 560.39 558.56

Fan Placement: US06 Only - One Large Fan - Up - Front

Phase Time (secs)	129.91	365.00	107.10
Distance (miles)	1.760	6.232	
Bag Analysis Time (secs)	131.0	353.0	

### MFR Test Results

for Procedure 90 US06

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.011	0.077	0.015	373	0	0.0063

Odometer  
4489 M

MPG  
23.8

MPG is 10.97 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7  
Fuel: 61 Tier 2 Cert Gasoline

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 5/11/2012 11:45:04 AM  
**Subject:** RE: Audi test results  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Vince.

Could you let us know if the 3 Liter car is released? If so we will pick it up.

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, May 11, 2012 7:23 AM  
To: Rodgers, William (EEO)  
Cc: Jim Snyder; Giles, Michael (EEO)  
Subject: Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 05/10/2012 02:21 PM  
Subject: Audi test results

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 5/11/2012 12:09:39 PM  
**Subject:** RE: Audi test results  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Mike,

D3UF-DAQ has been released. You may pick the vehicle up at any time through Security as usual. They have the release slip and keys.

Thanks,

Vince Mazaitis

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**Cc:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 05/11/2012 07:46 AM  
**Subject:** RE: Audi test results

Thanks Vince.

Could you let us know if the 3 Liter car is released? If so we will pick it up.

**From:** Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
**Sent:** Friday, May 11, 2012 7:23 AM  
**To:** Rodgers, William (EEO)  
**Cc:** Jim Snyder; Giles, Michael (EEO)  
**Subject:** Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 05/10/2012 02:21 PM  
Subject: Audi test results

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 5/11/2012 1:36:00 PM  
**Subject:** RE: Audi test results  
[Verify D3UJ-DAQ 5-9-12.pdf](#)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Mike,

Here's the Verify results. Sorry the sheets are not complete (pages) but I think all the information you need is included. If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 05/11/2012 08:31 AM  
**Subject:** RE: Audi test results

Vince,

Can you please send me the VERIFY test numbers? I think only Bill gets the email with this and he is out until Tuesday.

Thanks,

Mike

**From:** Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
**Sent:** Friday, May 11, 2012 7:23 AM  
**To:** Rodgers, William (EEO)  
**Cc:** Jim Snyder; Giles, Michael (EEO)  
**Subject:** Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 5/14/2012 12:10:02 PM  
**Subject:** FW: Release of Audi Test Vehicle D3UJ-DAQ  
[\[mailto:Mazaitis.Vincent@epamail.epa.gov\]](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I think I should have sent the email below to you about releasing the Audi A8 – sorry about that. Please let us know status when you can.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Friday, May 11, 2012 2:17 PM  
To: 'Vincent Mazaitis'  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com); Berenz, Sebastian (EEO)  
Subject: Release of Audi Test Vehicle D3UJ-DAQ

Hello Vince,

We are finished with the A8 4.0L (vehicle D3UJ-DAQ). Please let us know when it is released and we will arrange to have it picked up. I understand that we may be dropping off an in-use vehicle mid-week, we may decide to handle both tasks then.

Please advise.

Thanks,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, May 11, 2012 9:36 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Audi test results

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**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Berenz, Sebastian (EEO)" [Sebastian.Berenz@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/14/2012 1:16:29 PM  
**Subject:** Re: Release of Audi Test Vehicle D3UJ-DAQ  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Mike,

I'll release it this morning.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Berenz, Sebastian (EEO)" <Sebastian.Berenz@vw.com>  
Date: 05/11/2012 02:20 PM  
Subject: Release of Audi Test Vehicle D3UJ-DAQ

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; 'Bill Pagels' [bill.pagels@meidenamerica.com]; 'Bob Maxwell' [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA;"Dave Kosmalski" [david.kosmalski@gm.com]; 'Dave Kosmalski' [david.kosmalski@gm.com]; 'Dennis Pawlak' [Dennis.Pawlak@na.mitsubishi-motors.com]; 'Douglas Reid' [Douglas.Reid@na.mitsubishi-motors.com]; 'Duoba, Mike' [mduoba@anl.gov]; 'Jeff Foor' [jdf14@chrysler.com]; 'Jim Smith' [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA;"Keith Thompson" [Keith.Thompson@bepco.com]; 'Keith Thompson' [Keith.Thompson@bepco.com]; 'Kent Theil' [okt@chrysler.com]; 'kyle.bedsole@gm.com' [kyle.bedsole@gm.com]; 'Mahmoud Yassine' [mky@chrysler.com]; 'Marc Belzile' [marc.a.belzile@tc.gc.ca]; 'mark paxton' [mpaxton@ganassi.com]; 'MBrussow@sae.org' [MBrussow@sae.org]; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.) [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov' [Paulina.Carl@epamail.epa.gov]; Peabody, Jason (J.A.) [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com' [takashi\_a\_fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodtt/AA/USEPA/US@EPA;"tom.beierschmitt@tema.toyota.com" [tom.beierschmitt@tema.toyota.com]; 'tom.beierschmitt@tema.toyota.com' [tom.beierschmitt@tema.toyota.com]; 'tommy\_chang@ahm.honda.com' [tommy\_chang@ahm.honda.com]; 'William Meschievitz' [william.meschievitz@tema.toyota.com]; 'Khan, Farrukh' [KhanF@NRD.NISSAN-USA.COM]

**Cc:** Carl Paulina/AA/USEPA/US@EPA[]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Mon 5/14/2012 4:40:56 PM

**Subject:** RE: J2951 Phase II Review

<https://www.connectmeeting.att.com>

Hi all,

We are scheduled to have a J2951 meeting this Thursday. Since we are trying to wrap-up J1634 this month, it might make sense to cancel this meeting and focus on the J1634 ballot prep. Please let me know if you have any issues that need to be discussed this month, otherwise we'll cancel and reconvene in June.

Thanks,  
Jeff

-----Original Appointment-----

From: Glodich, Jeffrey (J.M.)

Sent: Friday, January 20, 2012 1:11 PM

To: Glodich, Jeffrey (J.M.); Beierschmitt, Thomas (T.A.); 'Bill Pagels'; 'Bob Maxwell'; 'chris nevers'; 'Dave Kosmalski'; 'Dennis Pawlak'; 'Douglas Reid'; 'Duoba, Mike'; 'Jeff Foor'; 'Jim Smith'; 'Jim Snyder'; 'Keith Thompson'; 'Kent Theil'; 'kyle.bedsole@gm.com'; 'Mahmoud Yassine'; 'Marc Belzile'; 'mark paxton'; 'MBrussow@sae.org'; 'Meyer, Norm'; Okawa, Naoyasu (N.); 'Paulina.Carl@epamail.epa.gov'; Peabody, Jason (J.A.); Pete Janosi; Suanne.Thomas@vw.com; 'takashi\_a\_fujiwara@ahm.honda.com'; Tiffany Jackson; 'Tom Schrodtt'; 'tom.beierschmitt@tema.toyota.com'; 'tommy\_chang@ahm.honda.com'; 'William Meschievitz'; Khan, Farrukh

Cc: Carl Paulina

Subject: J2951 Phase II Review

When: Thursday, May 17, 2012 1:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Toyota, Ann Arbor

Purpose:

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

Meeting Info:

**Ex. 6**

Web Address <https://www.connectmeeting.att.com>

**Ex. 6**

**To:** "Glodich, Jeffrey (J.M.)" [jglodich@ford.com]  
**Cc:** "MBrussow@sae.org" [MBrussow@sae.org]; 'Paulina.Carl@epamail.epa.gov'  
[Paulina.Carl@epamail.epa.gov]; 'tommy\_chang@ahm.honda.com'  
[tommy\_chang@ahm.honda.com]; 'tom.beierschmitt@tema.toyota.com'  
[tom.beierschmitt@tema.toyota.com]; 'Bill Pagels' [bill.pagels@meidenamerica.com]; 'Dave Kosmalski' [david.kosmalski@gm.com]; 'Douglas Reid' [Douglas.Reid@na.mitsubishi-motors.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; 'Jim Smith' [james.smith@chrysler.com]; 'Jeff Foor' [jdf14@chrysler.com]; Peabody, Jason (J.A.) [jpeabod6@ford.com]; 'Keith Thompson' [Keith.Thompson@bepco.com]; 'Khan, Farrukh' [KhanF@NRD.NISSAN-USA.COM]; 'kyle.bedsole@gm.com' [kyle.bedsole@gm.com]; 'Marc Belzile' [marc.a.belzile@tc.gc.ca]; 'Duoba, Mike' [mduoba@anl.gov]; 'Mahmoud Yassine' [mky@chrysler.com]; 'mark paxton' [mpaxton@ganassi.com]; hris Nevers/AA/USEPA/US@EPA; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; 'Meyer, Norm' [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.) [okawa.n@mazda.co.jp]; 'Kent Theil' [okt@chrysler.com]; arl Paulina/AA/USEPA/US@EPA; Pete Janosi [petejanosi@yahoo.com]; ete Janosi [petejanosi@yahoo.com]; 'Bob Maxwell' [remaxwell@comcast.net]; homas Schrodt/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; 'Suanne.Thomas@vw.com' [Suanne.Thomas@vw.com]; im Snyder/AA/USEPA/US@EPA; 'Suanne.Thomas@vw.com' [Suanne.Thomas@vw.com]; 'Suanne.Thomas@vw.com' [Suanne.Thomas@vw.com]; 'takashi\_a\_fujiwara@ahm.honda.com' [takashi\_a\_fujiwara@ahm.honda.com]; Beierschmitt, Thomas (T.A.) [tbeiers1@ford.com]; 'William Meschievitz' [william.meschievitz@tema.toyota.com]  
**From:** "Dennis Pawlak"  
**Sent:** Mon 5/14/2012 5:21:03 PM  
**Subject:** RE: J2951 Phase II Review  
<https://www.connectmeeting.att.com>

I'm fine with June.

Best Regards,

Dennis M. Pawlak  
Manager, Vehicle Verification  
Mitsubishi Motors R&D of America, Inc.  
dennis.pawlak@na.mitsubishi-motors.com  
Office: 734-477-6146 fax: 734-971-0901

\*\*\*\*\* CONFIDENTIALITY STATEMENT \*\*\*\*\*

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\*\*\*\*\*

\*

From: "Glodich, Jeffrey (J.M.)" <jglodich@ford.com>  
To: "Beierschmitt, Thomas (T.A.)" <tbeiers1@ford.com>, "Bill Pagels" <bill.pagels@meidenamerica.com>, "Bob Maxwell" <remaxwell@comcast.net>, "chris nevers" <nevers.chris@epa.gov>, "Dave Kosmalski" <david.kosmalski@gm.com>, "Dennis Pawlak"

<Dennis.Pawlak@na.mitsubishi-motors.com>, "Douglas Reid" <Douglas.Reid@na.mitsubishi-motors.com>, "Duoba, Mike" <mduoba@anl.gov>, "Jeff Foor" <jdf14@chrysler.com>, "Jim Smith" <james.smith@chrysler.com>, "Jim Snyder" <snyder.jim@epa.gov>, "Keith Thompson" <Keith.Thompson@bepco.com>, "Kent Theil" <okt@chrysler.com>, "kyle.bedsole@gm.com" <kyle.bedsole@gm.com>, "Mahmoud Yassine" <mky@chrysler.com>, "Marc Belzile" <marc.a.belzile@tc.gc.ca>, "mark paxton" <mpaxton@ganassi.com>, "MBrussow@sae.org" <'MBrussow@sae.org'>, "Meyer, Norm" <norm.meyer@tc.gc.ca>, "Okawa, Naoyasu (N.)" <okawa.n@mazda.co.jp>, "Paulina.Carl@epamail.epa.gov" <'Paulina.Carl@epamail.epa.gov'>, "Peabody, Jason (J.A.)" <jpeabod6@ford.com>, Pete Janosi <petejanosi@yahoo.com>, "Suanne.Thomas@vw.com" <Suanne.Thomas@vw.com>, "takashi\_a\_fujiwara@ahm.honda.com" <takashi\_a\_fujiwara@ahm.honda.com>, Tiffany Jackson <JacksT2@nrd.nissan-usa.com>, "Tom SchrodT" <SchrodT.Thomas@epamail.epa.gov>, "tom.beierschmitt@tema.toyota.com" <'tom.beierschmitt@tema.toyota.com'>, "tommy\_chang@ahm.honda.com" <'tommy\_chang@ahm.honda.com'>, "William Meschievitz" <william.meschievitz@tema.toyota.com>, "Khan, Farrukh" <KhanF@NRD.NISSAN-USA.COM>  
Cc: "Carl Paulina" <Paulina.Carl@epamail.epa.gov>  
Date: 05/14/2012 12:40 PM  
Subject: RE: J2951 Phase II Review

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Cc: Carl Paulina  
Subject: J2951 Phase II Review  
When: Thursday, May 17, 2012 1:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).  
Where: Toyota, Ann Arbor

Purpose:

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- Revisit deferred issues that were not addressed in the initial publication

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Web Address <https://www.connectmeeting.att.com>

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**Cc:** Carl Paulina/AA/USEPA/US@EPA[]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Tue 5/15/2012 11:23:29 AM

**Subject:** Cancelled: J2951 Phase II Review

Meeting canceled for this month.

**Purpose:**

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**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com>>

**Ex. 6**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 5/16/2012 1:54:20 PM  
**Subject:** VW Group - Decision Information for 3.0L TDI

Hello Jim,

We just submitted 2 Decision Information requests for the following related vehicles:

Test Group	VehicleID	Configuration	Model
DADXT03.03UG	D3UG-TAQ	0	Audi Q7
DADXT03.02UG	D3UG-TAQ	1	Volkswagen Touareg

Note, both of these vehicles are the EDV for their test groups. While the test group and models are carryover, these vehicles represent a new generation for the engine with updated hardware and software. Please contact me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 5/16/2012 8:26:55 PM  
**Subject:** RE: VW Group - Decision Information for 3.0L TDI  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

You are correct, the heavier Q7 is tighter against the Touareg standard. That is the reason for the split since MY 2011.

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, May 16, 2012 3:58 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Decision Information for 3.0L TDI

Why are they separate test groups if they are the same test vehicle? Is the SFTP composite marginal on the heavy one?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
Date: 05/16/2012 09:54 AM  
Subject: VW Group - Decision Information for 3.0L TDI

Hello Jim,

We just submitted 2 Decision Information requests for the following related vehicles:

Test Group	VehicleID	Configuration	Model
DADXT03.03UG	D3UG-TAQ	0	Audi Q7
DADXT03.02UG	D3UG-TAQ	1	Volkswagen Touareg

Note, both of these vehicles are the EDV for their test groups. While the test group and models are carryover, these vehicles represent a new generation for the engine with updated hardware and software. Please contact me if you have any questions.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/17/2012 11:08:06 AM  
**Subject:** RE: Bentley Mulsanne  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim,

There will be one configuration (#6500 only) for the Mulsanne. This means using substitute data from the previous model year which had different ETW/RLHP. Only one set test of data will represent the entire test group for emissions and fuel economy.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, May 16, 2012 5:14 PM  
To: Jim Snyder  
Cc: Rodgers, William (EEO)  
Subject: Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
Date: 05/16/2012 05:04 PM  
Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case.

Bentley needs to submit data explaining why they think the previous configuration is worse for emission than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/17/2012 11:37:18 AM  
**Subject:** RE: Bentley Mulsanne  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim,

I just spoke to Bentley. I think I was successful in persuading them to just present a complete set of new test data instead of burning up valuable hours trying to justifying the comparability of the two vehicles.

Thanks for your help.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, May 16, 2012 5:14 PM  
To: Jim Snyder  
Cc: Rodgers, William (EEO)  
Subject: Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/16/2012 05:04 PM  
Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case. Bentley needs to submit data explaining why they think the previous configuration is worse for emission

than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; inc Wehrly/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**Cc:** "Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 5/17/2012 8:54:44 PM  
**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Jim and Linc:

If there are others at EPA that you wish to include, please let me know, and I will send out a revised invitation.

Best regards,

Len

-----  
Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

Ex. 6

Join by Phone

Ex. 6

Find a local number<<https://dialin.vw.com>>

Ex. 6



# Ex. 6

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 5/17/2012 9:16:29 PM  
**Subject:** RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

Thanks, will do.

Len

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, May 17, 2012 5:15 PM  
To: Kata, Leonard (EEO)  
Cc: Joel Ball; Joel Dalton; Linc Wehrly; Stephen Healy; Chris Nevers; DavidA Wright; William Ott  
Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System

Len, Please add the above people to your mtg invitation in case they are interested.

This is a web mtg with Germany on their upcoming multipoint/direct injection fuel system on May 30 at 8am.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 5/17/2012 9:22:56 PM  
**Subject:** Cancelled: VW and EPA Meeting - MPI/FSI Fuel Injection System

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Jim:

I have added the names that you mentioned.

Best regards,

Len

-----  
Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

.....  
**Ex. 6**  
.....

Join by Phone

**Ex. 6**

Find a local number<<https://dialin.vw.com>>

**Ex. 6**  
.....



To:

Ex. 7

Ex. 7

Wehrly/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; oel Dalton/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA[]; illiam Ott/AA/USEPA/US@EPA[]

Cc:

Ex. 7

Ex. 7

From:

Ex. 7

Sent: Thur 5/17/2012 9:22:56 PM

Subject: Rescheduled: VW and EPA Meeting - MPI/FSI Fuel Injection System (May 30 08:00 AM EDT in Online Meeting)

When: Wednesday, May 30, 2012 8:00 AM-9:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Online Meeting

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

To all:

I have scheduled an online meeting to discuss the Volkswagen Group MPI/FSI Fuel Injection System. If this time is not acceptable or you cannot join this meeting through the internet connection provided, please let me know.

Ex. 7

I have added the names that you mentioned.

Best regards,

Ex. 7

Ex. 7

**Ex. 7**

Join by Phone

**Ex. 7**

Find a local number<<https://dialin.vw.com>>

**Ex. 7**

Forgot your dial-in PIN?<<https://dialin.vw.com>> | First online

meeting

**Ex. 7**

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 5/18/2012 3:23:18 PM  
**Subject:** VW Group - Certificate Request DVWXV02.0U4S (2.0l TDI-SCR)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I submitted a Certificate Request for the 2013 VW Passat 2.0L TDI-SCR, test group DVWXV02.0U4S. This is a carryover from 2012 with no changes.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** Linc Wehrly/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 5/21/2012 1:02:41 PM  
**Subject:** Testing Strategy Approval Request - Audi Start/Stop Systems  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Hello Dave;

After our visit with the demonstration 4.0L V8 Audi A8 on May 8th and equipped with cylinder deactivation and start/stop strategy, we reviewed our testing strategy and have the following request.

The 3.0L V6 engine equipped Audi A8 emission data vehicle tested on May 2nd and May 8th at the EPA facility, was tested in two configurations. That is: complete five cycle tests with start/stop active and a complete second set of tests with start/stop system inactive at our facility in Ingolstadt . EPA confirmed the city tests in both configurations, start/stop active and inactive. Under the start/stop enable conditions you saw during the presentation, it is clear that the engine does not stop during three of the 5-cycle tests. There is no engine shut down in Highway, SC03 and Cold CO test cycles and only marginal engine stop in the US06 test cycle. The current start/stop strategy would yield on minor fuel economy improvement in the FTP and US06 cycle and therefore we would prefer to test only the FTP and US06 harmonically average the two sets of test configurations together at the 50/50 rate.

The high cost testing burden at our facility would be lessened and testing capacity could improve. Until which time there are some operational start/stop system strategy changes, we would propose to test only the FTP and US06 with start/stop active and inactive and average these tests at the 50/50 rate.

If you have any questions, please contact me directly.

Best regards,

Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)



Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Verify Help Desk [verifyhelp@csc.com]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 5/21/2012 7:08:40 PM  
**Subject:** VW Group - Error on Request for Certificate

Hello,

I received the below error when submitting a request for certificate for Lamborghini Test Group DNLXV06.5L83.

Note, we confirmed that we submitted information related to this test group both in our preliminary GHG report and in the Certification preview meeting.

Also, the application document was received into VERIFY with email confirmation prior to this error.

Please advise.

Regards

Mike

Transaction: \_79e19103-1dbf-445c-9a41-0271990accc6

#### Transaction Status Details

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-CERT-CR-BR027 - If GHG Pre-Model Year Report Indicator (CR-22) is 'Y' (Yes), then an LD-GHG Pre-Model Year Report must have been submitted for this Model Year (CR-3).

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 5/22/2012 1:13:30 PM  
**Subject:** FW: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

We have submitted the application for Lamborghini but are having strange issues with VERIFY related to submitting a request for certificate.

In the meantime if you can let me know if you have any questions about this, please let me know.

This is a carryover test group with same Exhaust and Evaporative tests, but the exhaust uses the new EPA assigned additive DF's. Also, we are adding two stop/start configurations for MY 2013 (in addition to the two existing non-stop/start configurations).

Thanks,  
Mike

-----Original Message-----

From: Giles, Michael (EEO)  
Sent: Tuesday, May 22, 2012 8:40 AM  
To: 'Verify Help Desk'  
Cc: Harris, Dale; Rodgers, William  
Subject: RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Ex. 6

The GHG report was already submitted through Mfr. VWX. To confirm this, see attached error message when we tried to re-submit the file through NLX.

Why doesn't the system accept our "Y" answer that the GHG report was submitted, as it did in the past? It appears that this field is broken or has become non-functional, whereas it would be the best solution for us with multiple Mfr codes.

Can you help point us in the right direction here as we need to understand the process changes.

Thanks,  
Mike

#####

Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf - Message  
From: Verify Administrator  
Subject: Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf  
Date: Tue 5/22/2012 8:06 AM

Your recent submission for the file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf has been received by EPA. The following errors in your submission prevented it from being accepted by EPA.  
Validation Error(s):

- DOC-BR14 - The document file name 'CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf' already exists in the Verify system.

The following document identifier has been assigned to this request:

\_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

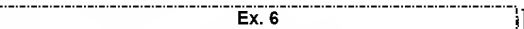
---

Document Name: CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf Transaction Identifier: \_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

[Click here to view the status history.](#)

Thank you for submitting your request to Verify via CDX.

-----Original Message-----

From:  On Behalf Of Verify Help Desk

Sent: Monday, May 21, 2012 5:51 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Error on Request for Certificate (HLP-2589)

Hello Mr. Giles,

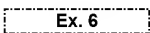
Verify help desk ticket HLP-2589 was opened for your inquiry.

I've verified that two documents were uploaded for NLX today; however, the Compliance Document Type associated with both documents is 'APPLICATION FOR CERTIFICATION.'

I do not see a document in the system for NLX associated with Compliance Document Type: LD-GHG Pre-model Year Report.

Please upload this report using this Compliance Document Type (see highlighted blue selection in screen shot). After you have uploaded this report and associated it with this document type please try your certificate request submission again and let me know if it is accepted.

(Embedded image moved to file: pic06422.gif)



Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael  
(EEO)"  
<michael.giles@vw.com> To  
Verify Help Desk@CSC, "Jim Snyder  
(Snyder.Jim@epamail.epa.gov)"  
05/21/2012 03:08 PM <Snyder.Jim@epamail.epa.gov>  
cc  
"Rodgers, William (EEO)"  
<William.Rodgers@vw.com>  
Subject  
VW Group - Error on Request for  
Certificate

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Note, we confirmed that we submitted information related to this test group both in our preliminary GHG report  
and in the Certification preview meeting.

Also, the application document was received into VERIFY with email confirmation prior to this error.

Please advise.

Regards  
Mike

Transaction: \_79e19103-1dbf-445c-9a41-0271990accc6

#### Transaction Status Details

Transaction Status Identifier : REJECTED Transaction Message Text : LD-CERT-CR-BR027 - If GHG Pre-Model Year  
Report Indicator (CR-22) is 'Y' (Yes), then an LD-GHG Pre-Model Year Report must have been submitted for this  
Model Year (CR-3).

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 5/22/2012 7:05:35 PM  
**Subject:** RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

It looks like I did manage to get the certificate request through. Can you confirm it made it to your side?

Thanks,  
Mike

-----Original Message-----

From: Giles, Michael (EEO)  
Sent: Tuesday, May 22, 2012 9:14 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Subject: FW: VW Group - Error on Request for Certificate (HLP-2589)

Hello Jim,

We have submitted the application for Lamborghini but are having strange issues with VERIFY related to submitting a request for certificate.

In the meantime if you can let me know if you have any questions about this, please let me know.

This is a carryover test group with same Exhaust and Evaporative tests, but the exhaust uses the new EPA assigned additive DF's. Also, we are adding two stop/start configurations for MY 2013 (in addition to the two existing non-stop/start configurations).

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Mike

-----Original Message-----

From: Giles, Michael (EEO)  
Sent: Tuesday, May 22, 2012 8:40 AM  
To: 'Verify Help Desk'  
Cc: Harris, Dale; Rodgers, William  
Subject: RE: VW Group - Error on Request for Certificate (HLP-2589)

Hello Vincent,

The GHG report was already submitted through Mfr. VWX. To confirm this, see attached error message when we tried to re-submit the file through NLX.

Why doesn't the system accept our "Y" answer that the GHG report was submitted, as it did in the past? It appears that this field is broken or has become non-functional, whereas it would be the best solution for us with multiple Mfr codes.

Can you help point us in the right direction here as we need to understand the process changes.

Thanks,



Mike

#####

Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf - Message  
From: Verify Administrator  
Subject: Submission rejected for your file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf  
Date: Tue 5/22/2012 8:06 AM

Your recent submission for the file upload CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf has been received by EPA.  
The following errors in your submission prevented it from being accepted by EPA.

Validation Error(s):

- DOC-BR14 - The document file name 'CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf' already exists in the Verify system.

The following document identifier has been assigned to this request:

\_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

---

Document Name: CBI\_DVWXV\_COMMON\_CR1A\_CAR\_R03.pdf Transaction Identifier: \_b101c00d-c6ea-43c9-a776-bbd8b441f6aa

[Click here to view the status history.](#)

Thank you for submitting your request to Verify via CDX.

-----Original Message-----

From: Vincent E Coleman [mailto:vc Coleman2@csc.com] On Behalf Of Verify Help Desk  
Sent: Monday, May 21, 2012 5:51 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Error on Request for Certificate (HLP-2589)

Hello Mr. Giles,

Verify help desk ticket HLP-2589 was opened for your inquiry.

I've verified that two documents were uploaded for NLX today; however, the Compliance Document Type associated with both documents is 'APPLICATION FOR CERTIFICATION.'

I do not see a document in the system for NLX associated with Compliance Document Type: LD-GHG Pre-model Year Report.

Please upload this report using this Compliance Document Type (see highlighted blue selection in screen shot). After you have uploaded this report and associated it with this document type please try your certificate request submission again and let me know if it is accepted.

(Embedded image moved to file: pic06422.gif)

Vincent

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael  
(EEO)"  
<michael.giles@vw.com> To  
Verify Help Desk@CSC, "Jim Snyder  
(Snyder.Jim@epamail.epa.gov)"  
05/21/2012 03:08 <Snyder.Jim@epamail.epa.gov>  
PM cc  
"Rodgers, William (EEO)"  
<William.Rodgers@vw.com>  
Subject  
VW Group - Error on Request for  
Certificate

Hello,

I received the below error when submitting a request for certificate for Lamborghini Test Group DNLXV06.5L83. Note, we confirmed that we submitted information related to this test group both in our preliminary GHG report and in the Certification preview meeting.

Also, the application document was received into VERIFY with email confirmation prior to this error.

Please advise.

Regards  
Mike

Transaction: \_79e19103-1dbf-445c-9a41-0271990accc6

Transaction Status Details

Transaction Status Identifier : REJECTED Transaction Message Text : LD-CERT-CR-BR027 - If GHG Pre-Model Year Report Indicator (CR-22) is 'Y' (Yes), then an LD-GHG Pre-Model Year Report must have been submitted for this Model Year (CR-3).

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/24/2012 2:42:49 PM  
**Subject:** VW Group Certification Requests

Hi Jim,

I have uploaded two Certification Requests and the associated Applications today for the following carryover test groups.

DVWXT03.6U76 – VW Touareg VR6

DVWXV06.3UA8 – Audi A8L W12 (VW test group)

Regards,

Bill Rodgers

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 5/29/2012 2:29:13 PM  
**Subject:** Audi Test Group - Lamborghini Gallardo Models  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Hello Bob;

I need your input in order to label 2013 Lamborghini Gallardo models that are contained in a 2013 Audi Test group. I attempted to enter index # 030 signed on as NLX (Lamborghini) and received the following error messages from Verify;

#### Transaction Status Details

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-FE-GL-BR202 - If the Manufacturer Code of the owner of the Representative Test Group (GL-13.5) is different than the Submitter's Manufacturer Code (in Submission Author Details), then permission must be granted by the Owner Manufacturer for the Submitting Manufacturer to use the Test Group. (Test Group = DADXV05.2LR8)

Transaction Message Text : LD-FE-GL-BR003 - The Submitter's Manufacturer Code (in Submission Author Details) must match the Carline Manufacturer Code (GL-10).

Transaction Message Text : LD-FE-GL-BR154 - Test Groups listed in the Unique Carline/Subconfiguration Test Groups (GL-207) must have one Certified Model Carline the same as the Carline of the Model Type for this FE Label. (Subconfiguration Test Group = DADXV05.2LR8)

There is a work around for BR154 that I don't want to use now, because I can wait till after the next release 10 deployment on June 1.

Previously we removed a couple of error messages by allowing Audi to use Lamborghini as an alternate manufacture by test group and carline. We have only two carlines 406 Gallardo Coupe and 426 Gallardo Spyder created as Audi division 3 in test group DADXV05.2LR8. I know you mentioned to me that we should not create more than one carline for a model name.

In an attempt to remove BR202 and BR003 we tried to sign on as Lamborghini and allow Audi as an alternative manufacture but got error processing messages: BR8, BR11, and BR10.

If you can tell me what the latest thinking is regarding the Volkswagen Group situation and manufacture

codes, carline and division numbers, I would appreciate it. Perhaps I should enter this as an Audi label and error BR003 will go away. If you feel that the Verify help people are up to speed and should handle this problem, please let me know and I will direct this to them.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; avid A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de]

**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]

**From:** "Kata, Leonard (EEO)"

**Sent:** Wed 5/30/2012 12:39:02 PM

**Subject:** RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

Hello all:

Unfortunately, not all participants were able to join the originally scheduled conference call and it was rescheduled for 0900 Detroit time today. I have a meeting conflict at 0900 that I thought I could change, but this is not possible. Therefore, we need to reschedule this conference call/web conference for later today. 1000 or later would be preferable.

Please let me know if this is possible.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Kata, Leonard (EEO)

Sent: Wednesday, May 30, 2012 8:16 AM

To: Kata, Leonard (EEO); Peter, Juergen (EASZ/1); Rech, Lothar (I/EA-523); Dorer, Frank, Dr. (EAES/3); Vieser, Steffen (I/EA-83); Schmidt, Oliver (EEO); 'Wehrly.Linc@epamail.epa.gov'; 'Jim Snyder'; 'Ball.Joel@epamail.epa.gov'; 'Dalton.Joel@epamail.epa.gov'; 'Healy.Stephen@epamail.epa.gov'; 'Nevers.Chris@epamail.epa.gov'; 'Wright.DavidA@epamail.epa.gov'; 'Ott.William@epamail.epa.gov'; Schlueter, Hannah (EXTERN: IAV); Stendel, Detlef (EASZ/1)

Cc: Rodgers, William (EEO); Giles, Michael (EEO)

Subject: RE: VW and EPA Meeting - MPI/FSI Fuel Injection System

From: Kata, Leonard (EEO)

Sent: Tuesday, May 29, 2012 10:03 AM

To: Peter, Juergen (EASZ/1); Rech, Lothar (I/EA-523); Dorer, Frank, Dr. (EAES/3); Vieser, Steffen (I/EA-83); Schmidt, Oliver (EEO); Wehrly.Linc@epamail.epa.gov; 'Jim Snyder'; Ball.Joel@epamail.epa.gov; 'Dalton.Joel@epamail.epa.gov'; Healy.Stephen@epamail.epa.gov; Nevers.Chris@epamail.epa.gov; 'Wright.DavidA@epamail.epa.gov'; 'Ott.William@epamail.epa.gov'; Schlueter, Hannah (EXTERN: IAV); Stendel, Detlef (EASZ/1)



Cc: Rodgers, William (EEO); Giles, Michael (EEO)  
Subject: VW and EPA Meeting - MPI/FSI Fuel Injection System

To all:

Tomorrow, May 30, 2012 at 0800 Detroit Time, we have scheduled a VW/EPA web conference to discuss the MPI/FSI fuel injection system.

I have attached a back-up copy of the slides that will be presented.

Please refer to the meeting invitation for connection details.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; inc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; avid A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de]

**From:** "Kata, Leonard (EEO)"

**Sent:** Wed 5/30/2012 12:55:33 PM

**Subject:** VW/EPA - MPI-FSI Fuel System

When: Wednesday, May 30, 2012 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: Web conference

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Ex. 6

Join by Phone

Ex. 6

Ex. 6

Ex. 6

First online

# Ex. 6

To all:

Sorry about the confusion. We have rescheduled the conference call for 1000 Detroit time.

The slides have been distributed a couple of time. Please let me know if you need these.

Web conference details are shown above.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Dorer, Frank, Dr. (EAES/3)" [frank.dorer@volkswagen.de]; Vieser, Steffen (I/EA-83)" [Steffen.Vieser@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA; Joel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Ball/AA/USEPA/US@EPA; Joel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; oel Dalton/AA/USEPA/US@EPA; Stephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; tephen Healy/AA/USEPA/US@EPA; Chris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; hris Nevers/AA/USEPA/US@EPA; David A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; avid A Wright/AA/USEPA/US@EPA; William Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; illiam Ott/AA/USEPA/US@EPA; "Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Schlueter, Hannah (EXTERN: IAV)" [extern.hannah.helena.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de]

**From:** "Kata, Leonard (EEO)"

**Sent:** Wed 5/30/2012 1:00:26 PM

**Subject:** VW/EPA Web Conference

To all:

This is the "belt and suspenders" approach. Please note that the VW/EPA web conference for MPI-FSI Fuel System is now on for 1000 Detroit time today. Details should appear on your calendars.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 5/30/2012 7:56:54 PM  
**Subject:** VW Group - Decision Information submitted for VID D3UB-CAQ

Hi Jim,

I submitted test data and DI for the 2013 Audi A6 quattro 2.0L TFSI. This is a new worst case EDV for the test group DADXV02.03UB already certified.

Manufacturer retests are required for FTP and HWY cycles due to High Fuel Economy for the ETW.

No new technology is used.

A running change and revised application will follow.

Regards,

Bill Rodgers

VWGoA

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 5/31/2012 4:49:49 PM  
**Subject:** VW Group - Certificate Requested for TG DVWXV03.6U41

Hello Jim,

Just a heads up that I submitted a new application and Certificate Request for 2013 Test Group DVWXV03.6U41, VW Passat 3.6L VR6. If you can get it processed by the end of next week that's fine.

Regards,

Bill Rodgers

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 6/5/2012 3:11:28 PM  
**Subject:** VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:

All required manufacturer confirmatory tests have been completed.

Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3)

DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 6/5/2012 5:13:29 PM  
**Subject:** RE: VW Group Certification Requests for 3.0L V6 TDI  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Hi Jim,

They are all about the same priority. Carry on.

Thanks Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 05, 2012 11:16 AM  
To: Rodgers, William (EEO)  
Subject: Re: VW Group Certification Requests for 3.0L V6 TDI

I already have other VW group cert requests that I working on through. Do you want me to jump to these two instead?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 06/05/2012 11:11 AM  
Subject: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,  
I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:  
All required manufacturer confirmatory tests have been completed.  
Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3)  
DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/6/2012 6:51:40 PM  
**Subject:** VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has evaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Vehicle ID: D3UF-CAQ

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/6/2012 8:17:36 PM  
**Subject:** RE: VW Group - Decision Information for Audi A6/A7 3.0L  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

I will try to get the letter to you by tomorrow morning.

The main difference is that the vehicles now have start/stop. Comparing to MY2012, there is also a new engine code, which likely reflects a software change. I will ask though and forward a more detailed answer.

Regarding fuel economy:

For the A6: Compared to MY 2012, My 2013 was slightly worse for city, and 1 mpg better on highway.

For the A7: Compared to MY 2012, the MY2013 is slightly worse for both city and highway.

Also, per our recent agreement with Dave Good, we plan to average start / stop results only for the FTP and US06 tests. For the other tests (Hwy, SC03, Cold CO) we will use inactive configurations only for FE because Start-Stop mode has no effect.

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 06, 2012 3:52 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Decision Information for Audi A6/A7 3.0L

When can I see the running change letter? Can you tell me what the changes are? Does it have higher FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/06/2012 02:52 PM  
Subject: VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has evaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Vehicle ID: D3UF-CAQ

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road

Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/6/2012 8:42:49 PM  
**Subject:** RE: VW Group - Decision Information for Audi A6/A7 3.0L  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

We did get a note through Richard Thomas (email from Dave). Thanks for the quick reply.

On another topic, I uploaded another application today and tried to request a certificate for the Eos. This is a carryover test group (DVWXV02.03SA). You should see the request soon, unless it failed because of the GHG rule (I'm leaving before I find out if it passed VERFIY validation).

Thanks

Mike

From: Jim Snyder [<mailto:Snyder.Jim@epamail.epa.gov>]  
Sent: Wednesday, June 06, 2012 4:22 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

Thanks for the clarification.

Yes, I thought I had sent you a confirmation earlier regarding the cycles but I guess I hadn't sent it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>



To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/06/2012 04:17 PM  
Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

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For the A6: Compared to MY 2012, My 2013 was slightly worse for city, and 1 mpg better on highway.

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Subject: Re: VW Group - Decision Information for Audi A6/A7 3.0L

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Jim Snyder  
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Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 6/7/2012 7:41:01 PM  
**Subject:** RE: VW Group - Decision Information for Audi A6/A7 3.0L  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hello Jim,

FYI I sent a request for certificate today for this test group (DADXJ03.03UF) with new evaporative family DADXR0140C7B. For this running change, I also submitted a revised initial application with the running change letters and other data (CSI, etc.) updated.

Please review and let us know if you have questions to issue the certificate.

Note – please cc Bill on any messages tomorrow as I will be out of the office Friday.

Thanks,

Mike

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United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 6/8/2012 2:24:19 PM  
**Subject:** VW Group - 2013 Tiguan test decision information

Hi Jim,

I submitted new fuel economy tests and Decision Information for the two configurations of 2013 Tiguan 2.0T Front-wheel drive (with and without low resistance tires). These models were already certified some time ago with carryover data from 2012 model year. The factory has since made a change in TCM software to for the 2013 Start of Production.

VW316 20145 – Configuration 2 (Front-wheel drive with Low resistance tires)

VW316 20145 – Configuration 3 (Front-wheel drive with Normal tires)

Regards,

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 6/11/2012 2:19:01 PM  
**Subject:** RE: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

As a follow up, could you advise on the status of the two 3.0L diesel certificates below?

We are being told this is urgent, so any assistance you can provide would be appreciated.

Thanks,

Mike

From: Rodgers, William (EEO)  
Sent: Tuesday, June 05, 2012 11:11 AM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael (EEO)  
Subject: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:

All required manufacturer confirmatory tests have been completed.

Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3)

DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 6/11/2012 3:11:30 PM  
**Subject:** RE: VW Group Certification Requests for 3.0L V6 TDI  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)

Great, thanks!

We will have another application for the 2.0L coming in hopefully today.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, June 11, 2012 11:01 AM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

So far it's looking like a fairly quiet week and there are none in front of them so this week looks likely unless I find some problems.

Jim Snyder  
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[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/11/2012 10:19 AM  
Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

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DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 6/12/2012 3:34:17 PM  
**Subject:** VW Group - Revised Certificate Requests

Hi Jim,

I have processed Revised Test Group and Certificate Requests for the following TG/Evap combinations:

Changes to the Manufacturer Codes and Division numbers were required to comply with Verify Fuel Economy Program and Release 10. Please process the approvals so we can get the fuel economy entered into the system.

cert\_request\_DADXV05.2LR8\_DADXR0130R8A

cert\_request\_DADXV04.03UJ\_DADXR0130D61

cert\_request\_DVWXV06.3UA8\_DVWXR0155D4B

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 6/12/2012 5:08:20 PM  
**Subject:** VW Group - Audi Test Group DADXJ03.03UF

Hi Jim,

As a follow up to my voice message, I am trying to make a minor correction to the test group data for the above test group (evap DF's need correction).

However, I get a rejection message indicating a possible open cert request. I ran a report for open cert requests which shows one item for this test group (below).

I think perhaps you could reject this and I will re-submit, or let me know if you need more info or have any suggestions.

Thanks,

Mike

#### Certificate Request Submission Information

#### Certificate Request Information Details

Request Process Code : N  
Manufacturer Specific Details

EPA Manufacturer Code : ADX  
Model Year : 2013  
Test Group Name : DADXJ03.03UF  
Commerce Introduction Date : 20120806

#### Application Specific Details

Meet All Applicable Standards Indicator : Y  
Meet All Applicable Requirements Indicator : Y  
OBD System Approval Indicator : Y  
CARB Executive Order Issued Indicator : NA

ORVR System Approval Indicator : Y  
Compliance Fee Paid Indicator : Y  
No Defeat Device Indicator : Y  
CAP2000 Conditional Indicator : N  
ICI Certificate Indicator : N  
Alternate Fuel Converter Certificate Indicator : N

EPA Generated Certificate Request Details

Original Receipt Date : 20120607  
Certificate Status Text : UNDREV

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

United States of America

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[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hello Jim,

As a follow up for our running change for test group (DADXJ03.03UF) with new evaporative family DADXR0140C7B:

It was necessary to correct the application to correct some minor errors in deterioration factors. So, that was done and submitted today. Due to the VERIFY locking issues I have requested another certificate.

Please note that the running change letter is in the application. Let us know if you need anything further from us to process the new certificate.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Thursday, June 07, 2012 3:41 PM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

FYI I sent a request for certificate today for this test group (DADXJ03.03UF) with new evaporative family DADXR0140C7B. For this running change, I also submitted a revised initial application with the running change letters and other data (CSI, etc.) updated.

Please review and let us know if you have questions to issue the certificate.

Note – please cc Bill on any messages tomorrow as I will be out of the office Friday.

Thanks,

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/13/2012 7:41:41 PM  
**Subject:** VW Group - Request for Certificate DVWXV02.0U5N

Hello Jim,

Today we submitted the application and request for certificate for Volkswagen carryover test group DVWXV02.0U5N. This test group is the one featuring the 2.0L TDI without SCR (Jetta, Audi A3, SportWagen).

This test group is carryover but includes two new models introduced as FEDV's (Beetle, Beetle Convertible).

We would like to request that this be high priority for VW group due to sales volume and timing. Please let me know if you have any questions.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 6/14/2012 12:32:31 PM  
**Subject:** VW Group - Revised Certificate needed DADXT03.02UG

Hi Jim,

I submitted a Certificate Lock request that requires a revised Certificate as the result of Verify Rel. 10 FE Program changes. We had to change the Mfr. Code to VWX, Div. 1, in the models covered section. It's something I missed when I recent submitted this to you. Sorry about that.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 6/14/2012 12:44:45 PM  
**Subject:** VW Group - Audi Certificate request for DAD XV05.2LR8

Jim,

Just FYI, the pending Certificate Request for test group DAD XV05.2LR8 submitted Tuesday is another one where we had to make a change to the Mfr. Code to satisfy the Verify FE program Release 10.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 6/14/2012 7:03:35 PM  
**Subject:** RE: VW Group - Request for Certificate DVWXV02.0U5N  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

Thanks for the notice, some issues caused my original cert request to be rejected (see below).

As it turns out, I was forced to make minor corrections to the DF values in the CSI. These values are now identical to previous years (a data communication error caused the wrong values in the original version). I have submitted the corrected application (R01) and received an cert request (accepted by verify, so you should also have it) /

Just a reminder this is rather high priority for us, so any assistance you can provide on this one would be appreciated.

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 13, 2012 5:35 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Request for Certificate DVWXV02.0U5N

As of 5:30, The only new request today was DAD XV02.03UB .

Jim Snyder  
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From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/13/2012 03:41 PM  
Subject: VW Group - Request for Certificate DVWXV02.0U5N

Hello Jim,

Today we submitted the application and request for certificate for Volkswagen carryover test group DVWXV02.0U5N. This test group is the one featuring the 2.0L TDI without SCR (Jetta, Audi A3, SportWagen).

This test group is carryover but includes two new models introduced as FEDV's (Beetle, Beetle Convertible).

We would like to request that this be high priority for VW group due to sales volume and timing. Please let me know if you have any questions.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 6/15/2012 12:45:45 PM  
**Subject:** VW Group - Decision Information

Hello Jim,

This morning we sent decision information requests for the new FEDV Beetle models which will be included in the 2.0L TDI test group DVWXV02.05UN for MY 2013.

Please advise of your decision at your earliest convenience.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 6/15/2012 6:13:59 PM  
**Subject:** Verify Question

Jim,

I revised the Initial Application for the test group DVWXJ02.03UA to reflect new tests we submitted representing new calibration for Start of Production on the worst case vehicle (Tiguan 4Motion automatic). My question is, do we need a revised Certificate if we already have one based on carryover data from 2012 model year? the Carline already exists on the Certificate and the tests were all waived.

Thanks

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 6/18/2012 11:02:23 AM  
**Subject:** RE: Verify Question  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim.

That was my thought as well, just making sure. Yes, the Application was revised with the new worst case data in the CSI.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, June 15, 2012 3:21 PM  
To: Rodgers, William (EEO)  
Subject: Re: Verify Question

If the new data was waived and the Part 1 was revised with the new CSI emission data then I think you are done since the certificate is unchanged.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 06/15/2012 02:14 PM  
Subject: Verify Question

Jim,

I revised the Initial Application for the test group DVWXJ02.03UA to reflect new tests we submitted representing new calibration for Start of Production on the worst case vehicle (Tiguan 4Motion automatic). My question is, do we need a revised Certificate if we already have one based on carryover data from 2012 model year? the Carline already exists on the Certificate and the tests were all waived.

Thanks  
Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 6/18/2012 1:22:26 PM  
**Subject:** RE: VW Group - Decision Information

Hello Jim,

I have submitted the supplemental information for the vehicle selected for testing (Beetle Convertible Automatic):

Vehicle ID: VW324 10220/13

Vehicle Configuration #: 0

Test Group Name: DVWXV02.0U5N

Please let me know the test date when it is set on your end.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Friday, June 15, 2012 8:46 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group - Decision Information

Hello Jim,

This morning we sent decision information requests for the new FEDV Beetle models which will be included in the 2.0L TDI test group DVWXV02.05UN for MY 2013.

Please advise of your decision at your earliest convenience.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 6/18/2012 2:54:39 PM  
**Subject:** 2013 Lamborghini Fuel Economy Label

Hello Jim;

Thank you for taking care of the reissue of the Audi 5.2L test group certificate last Friday, so I was able to process the Lamborghini Gallardo fuel economy label today. Four Gallardo labels were finally accepted by Verify.

Best regards,

Richard

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 6/19/2012 7:43:27 PM  
**Subject:** VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 6/19/2012 8:36:54 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our

understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



**To:** Linc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 5/17/2010 1:32:20 PM  
**Subject:** Road Load Determination Meeting

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 5/25/2010 12:50:58 PM  
**Subject:** RE: Q& tests

Audi accepts the fuel economy values from the confirmatory tests for vehicle B3UG-TAQ.

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, May 24, 2010 4:26 PM  
To: Hart, Robert (VWoA)  
Subject: Q& tests

Bob, can you send us a note saying VW accepts the FE values of the Audi Q7 EPA tests for our records?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division

United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 5/26/2010 11:32:48 AM  
**Subject:** VW Group: Audi A8 - B3UH-DAQ - Results Accepted

Hello Jim,

We finally received the results for the Audi A8 (B3UH-DAQ) in Verify. Audi has accepted the results. I asked Vince Mazaitis to release the car this morning.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 5/28/2010 12:07:36 PM  
**Subject:** RE: Supplemental Information for Vehicles Selected for Confirmatory Testing

Hello Jim,

In order for the lab to have the correct manual transmission shift tables, Verify has a section under the Confirmatory Test Decision page where new mfr. shift tables can be uploaded. This doesn't happen very often because most new cars use existing shift tables that have been in the lab database since CFEIS.

Except for the standard EPA ones, shift tables are manufacturer specific. In this case the (VW) shift tables existed, just not in the Audi specific section of the database.

I downloaded the required VW shift tables using my Volkswagen login, made the necessary modifications to the shift table reports to turn them into input files and resubmitted them through my Audi login.

Best regards,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, May 27, 2010 3:05 PM  
To: Hart, Robert (VWoA)  
Subject: Re: Supplemental Information for Vehicles Selected for Confirmatory Testing

Thanks for the info. To confirm, are you saying that the shift tables are now in Verify?

I informed the lab to check if it looks okay.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946

snyder.jim@epa.gov

From:

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

05/27/2010 02:13 PM

Subject:

Supplemental Information for Vehicles Selected for Confirmatory Testing

Hello Jim,

I have uploaded the required Supplemental Information for Bentley vehicle I.D. BY61021 cfigs 0 and 4 and VW vehicle I.D. VW416 80218 cfig 0.

There are also shift tables uploaded for the FTP and HFET for VW416 80218.

This VW is in an Audi test group and the required shift tables were not listed in the Audi database in Verify.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

To: Jim.Snyder/AA/USEPA/US@EPA[]  
From: **Ex. 7**  
Sent: Tue 6/1/2010 8:52:25 PM  
Subject: RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-  
**Non-Responsive**  
**Ex. 7**

Jim –

I will bring a small projector.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 01, 2010 4:28 PM  
To: **Ex. 7**  
Subject: RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in **Non-Responsive**  
**Non-Responsive**

# Non-Responsive

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: **Ex. 7**

To: Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Maria Peralta/AA/USEPA/US@EPA

Date: 06/01/2010 03:53 PM



Subject:

RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in

**Non-Responsive**

**Non-Responsive**

To all:

Attached is an advance copy of the presentation that VW will discuss tomorrow during our meeting on road load determination. Several participants will join by telephone from Germany, so it would be appreciated if a speaker telephone is available. The call-in details are provided below.

**Ex. 7** and I will attend the meeting in person. We expect the following participants, representing Volkswagen and Audi to join by telephone:

**Ex. 7**

Audio Conference Information:

**Non-Responsive**

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

# Ex. 7

<<EPA Road Load Determination Meeting.pdf>>

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Monday, May 17, 2010 10:42 AM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; **Ex. 7**  
Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;

Anderson.Tom@epamail.epa.gov

Cc: Peralta.Maria@epamail.epa.gov

Subject: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in **Non-Responsive**

**Non-Responsive**

When: Wednesday, June 02, 2010 9:30 AM-11:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: **Non-Responsive**

Invitation: Road Load Determination Meeting w/ VW

06/02/2010 -

Chair:

Jim Snyder/AA/USEPA/US

Sent By:

Snyder.Jim@epamail.epa.gov

Location:

**Non-Responsive**

Rooms:

**Non-Responsive**

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:

Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, **Ex. 7** Linc  
Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom  
Anderson/AA/USEPA/US@EPA

Optional:  
Maria Peralta/AA/USEPA/US@EPA

Description

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,

**Ex. 7**

\_\_ << File: ATT244576.htm >> << File: c104150.ics >> << File: ecblank.gif >> << File: pic00987.gif >>  
[attachment "EPA Road Load Determination Meeting.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 6/4/2010 7:33:31 PM  
**Subject:** VW Group: More Applications / Certificate Requests Submitted

Hello Jim,

I've been busy. There are Certificate requests for test groups: BADXT03.OTLF (1) / BADXV02.03UA (3) submitted. They all have the same SOP (this week) and same priority.

Whatever you can do to get them turned around quickly is greatly appreciated.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 6/9/2010 1:14:59 PM  
**Subject:** RE: missing test data

Hello Jim,

The test results for the 50°F FTP were in the database, I just forgot to put standards for it in the testgroup submission file. Results won't be listed in the Cert Summary Info Report without them.

I have corrected it and will upload the corrected application as soon as I have processed it.

We received the OBD approval for the Q7 diesel last night, so that is my priority before the test group above. There will be two 3.0l diesel applications. The one ending in 3UG (Audi Q7 - LDT4) is the priority. Except for the actual tests and LDT3 designation for the Touareg, the two diesel application are basically the same.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 08, 2010 6:31 PM  
To: Hart, Robert (VWoA)  
Subject: missing test data

Bob, for test group BADXV05.2LR8 BI see a test # listed for 50F test but no emission data. Looks like its missing.

Test Number	BADX10006239	Exhaust/Evaporative Test Number	Link
Test Procedure	52 - Fed. fuel 50 F exh.	Test Fuel Type	61 - Tier 2 Cert Gasoline
Test Date	2009-08-20	DF Type	Mfr. Determined
4WD Dyno	No	State of Charge	Delta
MFR Test Comment	4k FED. FUEL 50'F FTP - Tested as AUDI R8 SPYDER CONVERTIBLE 6 spd. autom. 2 dr. EDV -		
ETW:	4250		
	None		

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 6/23/2010 3:23:31 PM  
**Subject:** VW Group: Certificate Request for MY 2011 VW Test Grp: BVWXV03.6U46 Submitted

Hello Jim,

Just a "heads up" for a certificate request submitted for MY 2011 VW Test Grp: BVWXV03.6U46.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

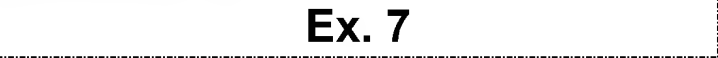
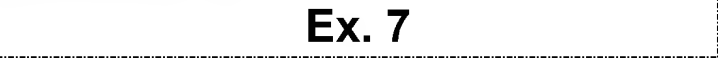
3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Linc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:**   
**From:**   
**Sent:** Fri 6/25/2010 8:23:29 PM  
**Subject:** Meeting to Discuss GHG Calculation Procedure

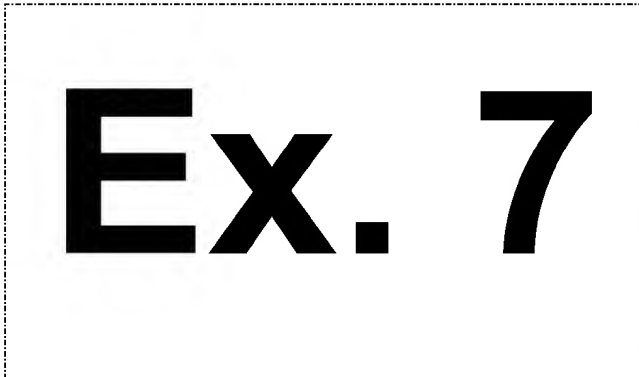
Hello Linc and Jim:

As mentioned during our recent meeting on road load determination, VW would like to meet with you to discuss our initial attempt at some of the compliance calculations for the GHG rule.

Our suggestion is to begin with the Early Credit Calculation for CO<sub>2</sub> (40 CFR 86.1867-12(a)). We will present you with our understanding of the rules pertaining to the four pathway approaches and the input data necessary to accomplish the calculations. We will follow with presentation of an example of the early CO<sub>2</sub> credit calculation and comparison of the pathway results.

My proposal would be to meet on Thursday, July 1, 2010 at 09:30, provided that you are available. If not, please let me know what your schedules may allow.

Best regards,



**Ex. 7**

Volkswagen Group of America, Inc.



**Ex. 7**





**To:** [redacted] **Ex. 7** [redacted] inc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** [redacted] **Ex. 7**  
**From:** [redacted]  
**Sent:** Tue 6/29/2010 5:18:29 PM  
**Subject:** Invitation: Volkswagen Meeting to Discuss Early CO2 Credit Calculations (Jul 1 11:00 AM EDT in [redacted] **Ex. 7**)

To all:

As discussed with Linc Wehrly at EPA, we are scheduled to meet on Thursday, July 1, 2010. The subject will be the early CO2 credit provisions in the EPA GHG final rule. We intend to present our understanding of the regulatory requirements and a sample calculation for the four pathway options.

Volkswagen's goal is to gain assurance that the calculation approach being considered and determination of the appropriate pathway is correct.

We did not discuss an end time, but from the Volkswagen side, we are flexible on this point.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 7/8/2010 2:39:53 PM  
**Subject:** RE: Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

Thanks Jim.

I guess it will just take a little time for it to register in Verify.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, July 08, 2010 10:36 AM  
To: Hart, Robert (VWoA)  
Subject: Re: Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

its issued

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
07/08/2010 07:44 AM

Subject:  
Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

Hello Jim,

Can you check on the status of the signing of the Certificate for Test Group BVWXV02.0U5N (2.0l Diesel)? Obviously, we can't get an ARB Executive Order until we submit the EPA Certificate to the ARB and their signing procedure takes considerably longer.

Any help you can provide to expedite the process will be greatly appreciated.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 7/12/2010 8:00:45 PM  
**Subject:** Running Change Requires a Revised Certificate

Hello Jim,

Another "heads up".

I just submitted a running change to add the Jetta model to diesel test group BVWXV02.0U5N. A revised certificate is required. Please process it as soon as possible. The only change to the application is the addition of the Jetta model. Everything required has been uploaded.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 7/19/2010 5:55:36 PM  
**Subject:** VW Group: Confidential Vehicle Names Question

Hello Jim,

What is the procedure for keeping a vehicle's name confidential until official release by the manufacturer?

The question comes from Lamborghini. They want to keep the commercial name of the new Lamborghini confidential until they release it during the Geneva Auto Show.

I need to know before I submit the certification documentation. It is still a week or two away, but we need to know so we can plan for whatever is necessary to accomplish it.

Does the "Introduction into Commerce Date" on the Certificate Request in the Verify System guarantee that no information will be released until that date?

I have already talked to ARB. Ex. 7 is checking with management to get their latest policy.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Fri 7/30/2010 10:22:03 PM  
**Subject:** RE: Lamborghini Catalyst By-Pass Request  
2007 request.pdf

Hello Jim:

There were a couple of pages at the end of the scanned document that included prior approvals. I have also attached a copy of the entire document that was ultimately stamped approved by EPA. Please let me know if you need anything else. I would appreciate some information on the status of this request.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, July 20, 2010 11:47 AM  
To: **Ex. 7**  
Subject: Re: Lamborghini Catalyst By-Pass Request

Is there supposed to be an attachment of the earlier approvals?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: **Ex. 7** @vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, **Ex. 7** @arb.ca.gov>  
Date: 07/20/2010 10:24 AM  
Subject: Lamborghini Catalyst By-Pass Request

Hello Jim and **Ex. 7**

As you may be aware, I submitted documents through VERIFY and EDMS that describe the function of the exhaust system on the LB83x Lamborghini application. This system includes a bypass of the downstream catalysts under extreme operating conditions. The function is analogous to the system from a past model year Lamborghini Gallardo which was approved by EPA and ARB. Copies of the old approval documents are provided for reference.

I just wanted to send a reminder that the request is in the workflow pending agency review. Your review and response would be appreciated.

Best regards,

**Ex. 7**

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

# VOLKSWAGEN of America, Inc.

Mr. Linc Wehrly  
Compliance and Innovative Strategies Division  
Light-Duty Vehicle Group  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105

Mr. Allen Lyons, Chief  
Mobile Sources Operations Divisions  
Haagen-Smit Laboratory  
P.O. Box 8001  
9528 Telstar Avenue  
El Monte, California 91734-8001

Leonard W. Kata Name  
Team Leader Title  
Engineering & Env. Office Department  
248-754-4204 Phone  
248-754-4207 Fax  
Leonard.kata@vw.com E-Mail

March 14, 2006 Date

Volkswagen of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone +1 248 754 5000  
Fax +1 248 754 4930

Subject: Lamborghini Murcielago Exhaust System

Gentlemen:

On March 1, 2006, representatives of Automobili Lamborghini, S.p.A. and Volkswagen of America, Inc. participated in a telephone conference call with you to discuss the design and function of the 2007 model year Lamborghini Murcielago exhaust system. In particular, Lamborghini provided details to the agencies regarding bypass valves included in the exhaust system. The intent of the call was to provide an overview of the technical description of the system and to seek feedback from EPA and ARB.

Prior to the call, you were provided with a drawing of the Murcielago exhaust system and a document that addresses the rationale for, and function of the system.

On March 8, 2006, EPA provided telephone confirmation that the agencies had discussed the system and concluded that it is acceptable and does not qualify as a defeat device. A formal, written response was offered.

We would appreciate a more formal response. Enclosed, for reference, is a copy of the technical information previously provided by e-mail.

Sincerely,



L. W. Kata

Enclosure

# **Ex. 4 - CBI**

# **Ex. 4 - CBI**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/11/2010 5:27:52 PM  
**Subject:** Confirmatory Test Results

Hello Jim,

Axel Reisner told me that you will send the test results via e-mail. I assume that he is talking about scanned copies of the QC'd lab reports for the tests.

Please include both Bill Rodgers (William.Rodgers@vw.com) and me as recipients of the e-mail so we have them if one of us is not here.

Thanks,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 8/13/2010 8:14:06 PM  
**Subject:** RE: Tiquan test results  
<mailto:Snyder.Jim@epamail.epa.gov>

Yes, I already have them.

Thanks,

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, August 13, 2010 4:12 PM  
To: Hart, Robert (VWoA)  
Subject: RE: Tiquan test results

Looks like they are in Verify now too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
08/13/2010 04:10 PM

Subject:  
RE: Tiquan test results



Thanks, Jim.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, August 13, 2010 4:04 PM  
To: Rodgers, William  
Cc: Hart, Robert (VWoA)  
Subject: Tiquan test results

Showed up but Hwy is missing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/18/2010 11:32:27 AM  
**Subject:** RE: Diesel Shift Tables

Hello Jim,

The shift schedules for the diesel use the same upshift points as the gasoline engines for the FTP and HWY but the declutch points are different as noted in my original message.

The cert engineer said that he will have to get back to me on the US06 shift schedule. The diesel may require additional downshifts for the US06.

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, August 17, 2010 4:55 PM  
To: Hart, Robert (VWoA)  
Subject: Re: Diesel Shift Tables

Bob, since this diesel uses the same schedules as the gas engines, is the US06 the same as the Tiquan we just tested? It uses 0035, 0036, and 0020 for US06.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
08/13/2010 08:47 AM

Subject:  
Diesel Shift Tables

Hello Jim,

According to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as indicated in the MY 2009 Application Common Sections (Section 12). These shift tables should already be in the EPA Lab database. They are the standard VW gasoline engine M6 shift tables.

Here are the upshift points by speed.

UP-SHIFT

1 - 2 15 mph

2 - 3 25 mph

3 - 4 40 mph

4 - 5 47 mph

5 - 6 52 mph

Due to the gear ratios in the diesel transmission the following declutch points must be used:

DECLUTCH

6 - 0 30 mph

5 - 0 25mph

4 - 0 20mph

I am still waiting for the US06 schedule.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)

Sent: Wednesday, August 11, 2010 4:00 PM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.

I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/18/2010 5:37:15 PM  
**Subject:** RE: Retest Request for VW Tiguan - VW416 80218 cfg. 0

I will let you know Bentley's answer first thing in the morning.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, August 18, 2010 11:55 AM  
To: Hart, Robert (VWoA)  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Re: Retest Request for VW Tiguan - VW416 80218 cfg. 0

Bob, do you know if Bentley is considering a retest on the US06? If so, we should do it before we switch fuels on monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>  
Date: 08/18/2010 09:01 AM  
Subject: Retest Request for VW Tiguan - VW416 80218 cfg. 0

Hello Jim,

I informed Vince Mazaitis that Volkswagen has requested a retest of the FTP and HWFET for the VW Tiguan – VW416 80218 cfg. 0.

Both fuel economy values are more than 3% different from the manufacturer test results.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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3800 Hamlin Road  
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Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 8/18/2010 8:00:38 PM  
**Subject:** Another Test Waiver Request Coming Soon

Hello Jim,

There is another test waiver request coming soon. This time for the Audi TT in Test Group BADXT02.03UA.

An additional engine is being added to the test group as a running change- fuel economy only – not a new worst case.

Also, I have seen the retest schedule for VW614 80218 in the VERIFY System.

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; ary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Wed 8/25/2010 10:54:35 PM  
**Subject:** Volkswagen Meeting with EPA Regarding Early CO2 Credits  
[EARLY CREDIT CALC.pdf](#)

Hello all:

As you may recall, Volkswagen met with you and other EPA staff members to discuss our interpretation of the early CO2 credits portion of the final GHG rule. We also raised a number of questions. At the end of the meeting we began to present a sample early credit determination, based on a preliminary version of an early credit calculation tool. However, it was difficult to follow without some prior study. We agreed to provide a written version.

Attached is a sample calculation that was prepared by hand to check against the tool that we are developing. As of now, the result of the hand calculations match the automated version. The attached version also explains the assumptions made in understanding the regulations and making the calculations. We would appreciate EPA review of this example to assure us that we are on the right track.

I will file a formal copy of the information through VERIFY, along with a marked-up copy of the slides presented at our meeting. The mark-up are the EPA comments. Please note that there are still some open issues. One in particular concerns the determination of CAFE-based credits as described for Pathway 3.

The current calculations are only for CO2 credits. We stated in the meeting that we are still evaluating early A/C credits and would come back to EPA on that topic.

Finally, there was one slide at the end of the presentation (Slide 31) that we did not have time to cover. It pertains to CH4 and N2O compliance procedures. We would like EPA concurrence with the compliance approaches presented. We also questioned the requirement of having to apply either the stand-alone CH4 and N2O compliance approach or the incorporation of CH4 and N2O in the CREE calculation to the entire fleet, and whether there is any flexibility on this point.



Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 8/26/2010 1:42:32 PM  
**Subject:** Release Request for Test Vehicle VW416 80218 cfg. 0

Hello Jim,

Volkswagen has accepted the test results for Test Vehicle VW416 80218 cfg. 0 (VW Tiguan).

Please release the vehicle for pick-up on Monday, August 26, 2010.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; oberts French/AA/USEPA/US@EPA;Mary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; ary Manners/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; Johnson, Stuart" [Stuart.Johnson@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Kata, Leonard"  
**Sent:** Wed 9/1/2010 4:21:56 PM  
**Subject:** RE: Volkswagen Meeting with EPA Regarding Early CO2 Credits

To all:

Just a reminder that we would appreciate your thoughts on the early credit exercise submitted to EPA. The documents attached to the earlier e-mail have been downloaded in the VERIFY system, along with a marked-up copy of the slides from our July 1, 2010 meeting. The mark-ups reflect the EPA comments made at the meeting.

We appreciate your verification of the early credit calculation procedure and an interpretation regarding the open issue on Pathway 3 (CAFE –based standard using a CAFE calculation with total federal sales versus sales from states other than California and Section 177 states).

Please feel free to contact me with any questions.

Best regards,.

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Kata, Leonard

Sent: Wednesday, August 25, 2010 6:55 PM

To: Wehrly.Linc@epamail.epa.gov; 'french.roberts@epa.gov'; 'manners.mary@epa.gov';

Good.David@epamail.epa.gov; 'Snyder.Jim@epamail.epa.gov'

Cc: Kohnen, Christoph (VWGoA); Johnson, Stuart; Giles, Michael

Subject: Volkswagen Meeting with EPA Regarding Early CO2 Credits

Hello all:

As you may recall, Volkswagen met with you and other EPA staff members to discuss our interpretation of the early CO2 credits portion of the final GHG rule. We also raised a number of questions. At the end of the meeting we began to present a sample early credit determination, based on a preliminary version of an early credit calculation tool. However, it was difficult to follow without some prior study. We agreed to provide a written version.

Attached is a sample calculation that was prepared by hand to check against the tool that we are developing. As of now, the result of the hand calculations match the automated version. The attached version also explains the assumptions made in understanding the regulations and making the calculations. We would appreciate EPA review of this example to assure us that we are on the right track.

I will file a formal copy of the information through VERIFY, along with a marked-up copy of the slides presented at our meeting. The mark-up are the EPA comments. Please note that there are still some open issues. One in particular concerns the determination of CAFE-based credits as described for Pathway 3.

The current calculations are only for CO2 credits. We stated in the meeting that we are still evaluating early A/C credits and would come back to EPA on that topic.

Finally, there was one slide at the end of the presentation (Slide 31) that we did not have time to cover. It pertains to CH<sub>4</sub> and N<sub>2</sub>O compliance procedures. We would like EPA concurrence with the compliance approaches presented. We also questioned the requirement of having to apply either the stand-alone CH<sub>4</sub> and N<sub>2</sub>O compliance approach or the incorporation of CH<sub>4</sub> and N<sub>2</sub>O in the CREE calculation to the entire fleet, and whether there is any flexibility on this point.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 9/27/2010 2:24:21 PM  
**Subject:** VW Group: Test Waiver Requests Submitted

Hello Jim,

I have just finished submitting four test waiver requests to Verify for model year 2011 test group BADXV04.2375.

There are two vehicles representing the R8 Spyder and R8 Coupe with an existing 4.2l V8 engine and an automated manual transmission and a manual transmission.

These cars are getting new catalysts (which has already been discussed with you), a new calibration, new injectors and a separate AIR pump for each bank for model year 2011.

Let me know if you have any questions.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 9/27/2010 8:21:18 PM  
**Subject:** Test Waiver Request Errors - 9/27/2010

Hello Jim,

This is in regard to our phone conversation on 9/27/2010.

I discovered an error that I made in the percent of standard for the SC03 4k CO tests results for the R8 test waiver requests. The macro I used added the DF to the 4k result before calculating the percent of standard. Actually, the results were less than 70% for both tests.

To compound that error, I thought the confirmatory test criteria was greater than or equal to 90%.

It was pointed out to me that it is only greater than 90%, so since the FTP 50k NOx is 90.0% percent of the standard, it is not necessary to perform manufacturer retests.

I apologize for the confusion. It's been a rough Monday.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326



Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 11/9/2010 9:25:43 PM  
**Subject:** Specifications and Calibration information for Power Measurement Shunt  
[2010-11-09\\_07-42-42.pdf](#)  
[2010-11-09\\_07-57-08.pdf](#)

Hello Jim,

Dr. Reisner gave me with some specifications and calibration information for the shunt that VW provided on the Touareg Hybrid to measure the power for the hybrid tests.

He thought that the EPA might want it for documentation. See attachments.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**HIOKI**

№ 2009E12385

Date Nov. 9, 2009

**CALIBRATION CERTIFICATE**

Customer \_\_\_\_\_

HIOKI E.E. CORPORATION

Y. Taki

Inspector

Quality Assurance Department

Model : 9278  
Name : UNIVERSAL CLAMP ON CT  
Production№ : 090900270

The above listed product(s) is/are calibrated in accordance with the HIOKI standards. This also certifies that all reference instruments used in the calibration process can be traced back to all or some of the official standards laboratories of the nations affiliated with the International Committee for Weights and Measures (CIPM), such as the National Institute of Advanced Industrial Science and Technology, the National Institute of Information and Communications Technology, and NIST (National Institute of Standards and Technology).

***Instruments used***

Model	Name	Control number	Production number
5520A	CALIBRATOR	000-10-115	8475009
3458A	MULTIMETER	000-20-193	US28030720
6620	PRECISION PHASEMETER	000-21-002	459
R9211B	FFT SERVO ANALYZER	505-55-008	02020139
4025	HIGH SPEED POWER AMPLIFIER/SUPPLY	000-50-079	145901
-----	SHUNT RESISTOR (10Ω)	505-31-087	-----
10A/100mV	TRIAx-SHUNT	000-31-163	R719364

Note: The issuing date of this CALIBRATION CERTIFICATE may differ from the inspection date in the INSPECTION DATA SHEET.



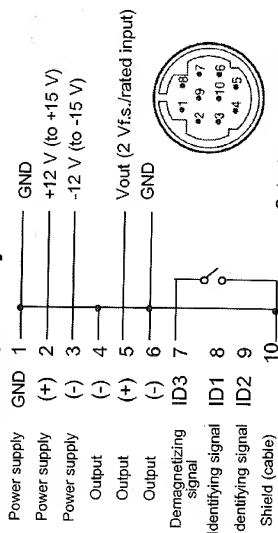
## Chapter 3 Specification

Model	9277	9278
Rated current (AC/DC)	20 A f.s.	200 A f.s.
Output voltage (AC/DC)	2 V/20 A	2 V/200 A
The maximum permissible input range (DC to 3 kHz)	50 Arms (75 Apeak)	350 Arms (500 Apeak)
Input resistance (DC)	Max. 0.05 mΩ	Max. 0.002 mΩ
Output resistance	50 Ω	
Basic accuracy 23±3°C (73±5°F)	DC and 45 Hz to 66 Hz, 30 min or more warming-up after degaussing Amplitude: ±0.5% rdg. ±0.05% f.s. Phase: within ±0.2° (DC has no provision)	
Period of guaranteed accuracy	1 year	
Amplitude-frequency characteristic (deviation from accuracy)	DC to 1 kHz within ±1.0% 1 k to 50 kHz within ±2.5% 50 k to 100 kHz within ±5.0%	
Phase-frequency characteristic	DC to 1 kHz within ±0.5° 1 k to 50 kHz within ±2.5° 50 k to 100 kHz within ±5.0°	
Temperature coefficient	Sensitivity: within ±0.05% rdg. /°C Offset: within ±0.005% f.s. /°C	
Operating temperature and humidity range	0 to 40°C (32 to 104°F), Max. 80%RH (no condensation)	
Storage temperature and humidity range	-10 to 50°C (14 to 122°F), Max. 80%RH (no condensation)	
Effect of conductor position	Within ±0.5% (DC, 55 Hz)	Within ±1.5% (DC, 55 Hz)

Model	9277	9278
Effect of external magnetic field (400 A/m, 55 Hz and DC)	Max. 0.2 A	Max. 1 A
Dielectric strength	3536 VrmsAC for 15 seconds. (between case and clamp sensor (aperture)) between electric circuit and case, between electric circuit and core, between electric circuit and clamp sensor (aperture)	
Maximum rated voltage to earth	600 V (CATII), 300 V (CATIII)	
Operating environment	Indoor, <Height 2000 m (6562 feet) ASL	
Diameter of measurable conductors	20 mm (0.79") or less	
Supply voltage	$\pm 12$ V to $\pm 15$ V (with accuracy guaranty but tracking)	
Power supply capacity	$\pm 150$ mA (with rated input)	$\pm 250$ mA (with rated input)
Supply consumption	Max. 3.6 W (with rated input)	Max. 7.2 W (with rated input)
Dimensions and mass	Approx. 176W×69H×27D mm (6.93"W×2.72"H×1.06"D)(excluding projections) Approx. 470 g (16.6 oz.)	
Cord length	Approx. 3 m (9.84 feet)	
Accessories	9375 CARRYING CASE 1 Instruction manual 1 Markband 6 (3 set)	
Standards	Safety: EN61010-2-032:2002 Type B current sensor Measurement category II, III, Pollution Degree 2 (4000 V expected transient Overvoltage) EN61326:1997+A1:1998+A2:2001 +A3:2003	
EMC:		

## Chapter 3 Specification

## Output connector pin array



## CAUTION

- Be careful to avoid connecting voltage improperly, as the internal circuitry may be destroyed.
- The capacity of the power supply is at least  $\pm 0.5$  A.
- Demagnetization occurs after pin 7 is shorted to ground and then opened.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 11/16/2010 6:30:57 PM  
**Subject:** RE: Pre-cert mtg

Hello Jim:

Thanks for the reminder. We are putting the finishing touches on our pre-certification letter and preparing the 2012 pre-model GHG report. I will be contacting you within the next few days to schedule a meeting.

Regards,

Ex. 7

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, November 16, 2010 1:04 PM  
To: Ex. 7  
Subject: Pre-cert mtg

Hi Ex. 7 was just talking to Ex. 7 and he said VW is planning on releasing some 2012MY vehicles start of January. I thought I'd remind you that prior to any 2012 certification, it is required to have a Pre-cert mtg which includes VW's proposed strategy for meeting the GHG requirements. The GHG plans are to show that you have a viable plan worked out. We realize this is new and plans may change but we want to verify that the manufactures understand it correctly.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 11/29/2010 12:39:07 PM  
**Subject:** Hybrid Prep/Test Procedure Requirements for the VW Touareg Hybrid

Hello Jim and Vince,

Please remind the lab prep/test drivers that the Start-Stop has to be enabled during the preconditioning AND the emissions test. We understand that this was overlooked for the preconditioning of the previous test attempt (according to the driver).

Un-enabled start-stop capability during preconditioning may influence the state of charge at the end of the preconditioning and the start of the UDDS test. This may result in an unexpected influence on the fuel economy or charge balance of the system.

The instructions are posted on the vehicle.

To enable the Start-Stop:

- 1) The hood lock must be engaged before the car is driven with the hood open on the dyno. The provided "dummy" must be engaged into the hood latch prior to starting the vehicle.
- 2) The doors must be shut
- 3) The drivers seat belt lock must be engaged (either by the provided dummy or the actual seat-belt. )

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office



Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 12/6/2010 4:34:08 PM  
**Subject:** Touareg Hybrid Confirmatory Test Results Accepted

Hello Jim,

Volkswagen accepts the results of the confirmatory test for the VW Touareg Hybrid (ID: VW526 710023 – cfg. 0).

Please cancel the retest and release the vehicle for pick-up tomorrow (Tuesday 7-Dec-10).

The first attempt to send this went to the wrong address.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Fri 12/10/2010 12:56:53 PM  
**Subject:** Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Ex. 7 from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 12/14/2010 6:44:54 PM  
**Subject:** RE: FW: Confernece Call - Audi

Hi Jim:

Tuesday at 10:00 sounds good to me. Lets pencil that in. I will let Ex. 7 know and see what he says.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Tuesday, December 14, 2010 1:35 PM  
**To:** Ex. 7  
**Subject:** Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

12/14/2010 01:27 PM

Subject:

FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, **Ex. 7** is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

**Ex. 7**

From:

**Ex. 7**

Sent: Friday, December 10, 2010 7:57 AM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi.

**Ex. 7** from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 12/14/2010 6:45:15 PM  
**Subject:** Recall: FW: Confernece Call - Audi

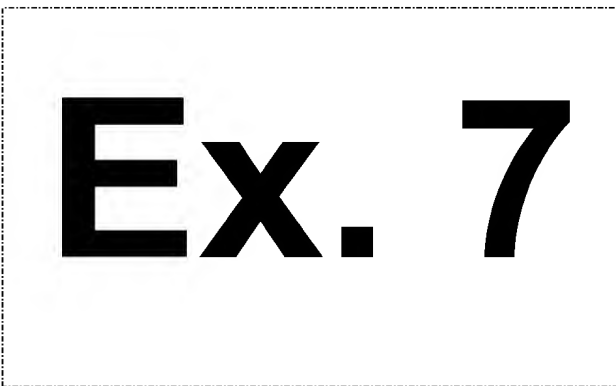
Ex. 7 would like to recall the message, "FW: Confernece Call - Audi".

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 12/15/2010 1:23:16 PM  
**Subject:** RE: FW: Conference Call - Audi  
<mailto:Snyder.Jim@epamail.epa.gov>

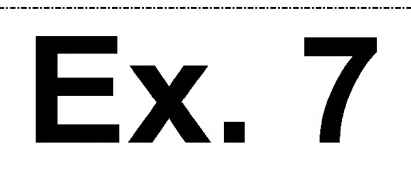
Hello Jim:

I can added a few people to my desk telephone using the conference feature, but I think that a conference call would be easier. I can easily set this up so you could call in to a local Non-Responsive number. I will send the coordinates to you and other cans join as needed.

Best regards,



Volkswagen Group of America, Inc.



**From:** Snyder.Jim@epamail.epa.gov [<mailto:Snyder.Jim@epamail.epa.gov>]  
**Sent:** Tuesday, December 14, 2010 5:51 PM  
**To:** Ex. 7  
**Subject:** RE: FW: Conference Call - Audi



**Ex. 7** I scheduled a room. Can you and **Ex. 7** connect and both call in to our phone? Or do we need a conference number?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

12/14/2010 01:47 PM

Subject:

RE: FW: Confernece Call - Audi

Hi Jim:

I just wrote back and tried to recall the message. I read your message too fast.

Next Monday at 10:00 sounds good. I will let **Ex. 7** know.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, December 14, 2010 1:35 PM

To: **Ex. 7**

Subject: Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

12/14/2010 01:27 PM

Subject:

FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, **Ex. 7** is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

**Ex. 7**

From: **Ex. 7**

Sent: Friday, December 10, 2010 7:57 AM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi.

**Ex. 7** from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 12/15/2010 6:18:18 PM  
**Subject:** RE: VW Group: MY 2012 Test Waiver Requests

Hi Jim,

There are two more coming shortly.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, December 15, 2010 1:15 PM  
To: Hart, Robert (VWoA)  
Subject: Re: VW Group: MY 2012 Test Waiver Requests

I now see six total. Is that all of them?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Hart, Robert (VWoA)" <Robert.Hart@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
12/15/2010 11:28 AM

Subject:  
VW Group: MY 2012 Test Waiver Requests

Hello Jim,

I just submitted two more MY 2012 test waiver requests. I expect to submit two more by the end of the day if possible.

The first four were for two FEDV's (automatic and manual transmission versions) for test group CVW XV02.5U35 – federal only BIN 5 new midsize sedan (NMS ).

This is a new model to be produced at VW's new factory in Tennessee.

The two from today and the two yet to be submitted are a PZEV version of the same vehicle.

These are all fuel economy tests for the first two test group applications that I have already submitted for certification.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]

**Cc:** Ex. 7

Ex. 7

**From:** Ex. 7

**Sent:** Fri 12/17/2010 3:51:32 PM

**Subject:** RE: ADP

Hello Jim:

I am not sure whether you are alerted to the letter I submitted to VERIFY. The vast majority of 2012 test groups are carryover from 2011. As mentioned in our certification preview, we use the VWADP that has been approved by EPA in the past and used for several years now. The SRC is primarily for Diesel test groups. The letter requests carryover of the previously approved procedure and nothifies EPA of the use of the SRC.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Monday, December 06, 2010 3:42 PM

To: **Ex. 7**  
Subject: ADP

**Ex. 7** I talked to **Ex. 7** about ADP and VW uses the SRC process which doesn't require approval. So all I need is a letter saying you are using EPA's SRC and we are all set on this.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; oel Ball/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; inc Wehrly/AA/USEPA/US@EPA;Martin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; artin Reineman/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA[]; om Anderson/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 12/20/2010 12:39:41 PM  
**Subject:** RE: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM EST in Non-Responsive  
01\_STSTSY-survey and MT.PDF

Hello All:

Attached are a few slides for our conference call this morning.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

<<01\_STSTSY-survey and MT.PDF>>

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Tuesday, December 14, 2010 5:49 PM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov; Non-Responsive



Subject: Invitation: Audi phone conference: Start/stop and manual trans (Dec 20 10:00 AM EST in **Non-Responsive**)

**Non-Responsive**

When: Monday, December 20, 2010 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where:

Invitation: Audi phone conference: Start/stop and manual trans

12/20/2010 -

Chair:

Jim Snyder/AA/USEPA/US

Sent By:

Snyder.Jim@epamail.epa.gov

Rooms:

**Non-Responsive**

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:

Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, **Ex. 7** Linc  
Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom  
Anderson/AA/USEPA/US@EPA

Description

EPA room phone is **Non-Responsive**

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices << File: ATT1507133.htm >> << File: c174846.ics >> << File: ecblank.gif >> << File: pic07156.gif >>

To: Jim Snyder/AA/USEPA/US@EPA]

Cc:

From:

Sent: Tue 12/28/2010 5:30:01 PM

Subject: 2012 Pre-Model GHG Report

**Ex. 7**

Hello Jim:

To ensure that we have met the December 31, 2010 deadline for a formal report submission, I have submitted the 2012 pre-model year GHG report through VERIFY, as we have discussed. This report uses our format and has been corrected to address the typographical errors noticed during the 12/01/2010 pre-certification meeting. The cover letter addresses the points raised in the regulations; such as, report contents, the use of credits (A/C, and early credits), and our plan regarding the incorporation of the N2O and CH4 values in an OCREE calculation.

Our intent is to further refine this report using the templates provided by Dave Good.

Best regards, and best wishes for the new year.

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 1/5/2011 9:20:28 PM  
**Subject:** VW Group: Another Cert Request

Hello Jim,

Welcome to the New Year! I hope your shoulder is OK.

I just submitted another model year 2012 certificate request – Test Group CADXJ02.03UA. The cert fees for this one have been paid for a while already.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]; illem  
VandenBroek/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 1/6/2011 3:57:47 PM  
**Subject:** RE: CVWXV02.03SA and CVWXV02.03PA

Hi Jim,

When I originally asked you to delay issue of the certificates for the two test groups until 2011, I thought that the cert fees were based on the issue date of the certificate.

Due to this situation, I now understand that they are based on the application submission date. Had I known this earlier, I would have waited to submit the applications.

Best regards,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, January 06, 2011 10:45 AM  
To: Thomas, Richard; Hart, Robert (VWoA); VandenBroek.Willem@epamail.epa.gov  
Subject: Re: CVWXV02.03SA and CVWXV02.03PA

I reviewed the cert request yesterday. Once I get the word from Bill that we have received the funds, I will approve the two certificates.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
Willem VandenBroek/AA/USEPA/US

To:  
"Thomas, Richard" <Richard.Thomas@vw.com>

Cc:

Jim Snyder/AA/USEPA/US@EPA

Date:

01/06/2011 09:30 AM

Subject:

CVWXV02.03SA and CVWXV02.03PA

Richard,

You should have received an automated email a few days ago saying that EPA had received payment for the Subject families at \$33,974 each. When we received the forms we charged them against the ACH payment for \$69,992 received from VW on 12/17/2010. (The forms for the remainder of that payment were filed from Germany). All that appears to be in order.

However, we noticed that the applications for these two families were filed in Calendar Year 2010. The fee is determined by the calendar year of the application (as stated at the top of the form), which, for applications received in calendar 2010, is \$34,849. Consequently, these two families have been designated as Short, On Hold, until the \$875 each has been received, upon which they will be listed as paid and cleared for certification review.

Let me know if you have any questions.

Bill Vanden Broek  
734-214-4468

**To:** Willem VandenBroek/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]; Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard"  
**Sent:** Fri 1/7/2011 1:31:36 PM  
**Subject:** FW:  
[20110107074935647.pdf](#)

Hello Bill;

Please find the Miscellaneous Payment Due forms for the two Volkswagen Test Groups where they were submitted during calendar year 2010 (last week in 2010) for which we paid the 2011 calendar year fee. It was originally anticipated that these two test groups would be submitted in calendar year 2011, not 2010. The payment of \$1,750 for these two test groups was electronically paid today.

We respectfully request that the work continue for the issuance of the Certificates of Conformity for these two test groups.

Best regards,

Richard E. Thomas  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com



U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
Miscellaneous Payments Due Form

Date: January 6, 2011

Manufacturer Name: VOLKSWAGEN Group of America, Inc.

Engine Family Name: C V W X V 0 2 . 0 3 P A

Original Payment Date: Dec. 17, 2010 Original Check#/Wire/ACH/Pay.gov Tracking Number: 5200051791 (optional)

Original Amount Paid: \$ 33,974 (optional)

Revised Engine Family Name: (optional)

Company Representative:

Name: Richard E. Thomas Phone: 248 754 4213

Email Address: Richard.Thomas@VW.com Fax: (optional)

## Reason for Payment:

- ☐ Incorrect/Revised engine family
- ☒ Underpayment
- ☐ New calendar year fee schedule change
- ☐ Component certification for evaporative emissions (\$241)
- ☐ Other

## Comments:

Application unexpectedly was submitted the very last week in 2010 and certification fees paid based upon 2011 cert fee rates creating a short fall of \$875.

## Fee Payment Details

Amount Paid: \$ 875

Enter the check number, or the statement "EFT/Wire" or "EFT/ACH": EFT/ACH

## Submission of payments and forms:

- (1) Online: Forms may be found and/or payments may be submitted online at [www.Pay.gov](http://www.Pay.gov).
- (2) Send checks and this form to:

Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000

- (3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, page 2)
- (4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (See Instructions, page 2.)
- (5) Forms not submitted under (1) and (2) above can be sent as e-mail attachments to [Fees@epa.gov](mailto:Fees@epa.gov).
- Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).



**U.S. Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
Miscellaneous Payments Due Form**

Date:

Manufacturer Name:

Engine Family Name:

Original Payment Date:  Original Check#/Wire/ACH/Pay.gov Tracking Number:  (optional)

Original Amount Paid: \$  (optional)

Revised Engine Family Name:   
 (optional)

Company Representative:

Name:  Phone:

Email Address:  Fax:  (optional)

## Reason for Payment:

- ☐ Incorrect/Revised engine family
- ☒ Underpayment
- ☐ New calendar year fee schedule change
- ☐ Component certification for evaporative emissions (\$241)
- ☐ Other

## Comments:

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- Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 1/13/2011 8:23:24 PM  
**Subject:** RE: audi cert

Hi Jim,

Any chance we'll get that one in the morning?

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, January 13, 2011 3:17 PM  
To: Hart, Robert (VWoA)  
Subject: audi cert

Looks like there's 1 left. It's been going real slow this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 1/13/2011 8:37:40 PM  
**Subject:** FW: audi cert

We have them all – THANKS Jim!!

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Thursday, January 13, 2011 3:23 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: audi cert

Hi Jim,

Any chance we'll get that one in the morning?

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, January 13, 2011 3:17 PM  
To: Hart, Robert (VWoA)  
Subject: audi cert

Looks like there's 1 left. It's been going real slow this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 1/26/2011 1:28:41 PM  
**Subject:** Audi - Application for certification CAD\_3UF  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted the necessary fuel economy retests and Applications for the 2012 Audi test group CADXV03.03UF. You will also find submitted Certificate Requests for the two related EVAP groups.

This is a carryover test group with the addition of a new model, Audi A7 quattro, and EVAP family CADXR0140C7A. Note, the CSI sheet that Verify generated for this new EVAP family is not in the usual test order somehow.

Please let me know if you see something that needs attention.

Best regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 1/26/2011 2:10:44 PM  
**Subject:** Audi - Certificate request test group CADXV03.03UF / EVAP family CADXR0140C7A  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

Just for clarification, in the Certificate Request for the new EVAP family CADXR0140C7A I indicated that the ORVR had not been EPA approved. In fact, it was previously reviewed and approved for the 2011 Audi A8 EVAP family BADXR0155D4Q as noted in the ORVR Safety Application in Section 15 of the Certification Application. Please Let me know if I need to revise the Certificate request.

Thanks,

Bill Rodgers

Engineering and Environmental Office

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(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 1/27/2011 6:31:46 PM  
**Subject:** Volkswagen certificates requested  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

Thanks for your help in denying the previous certificate requests this morning. I have resubmitted the two requests and the revised Applications for Audi test group CADXV03.03UF, EVAP families CADXR0140B8Q and CADXR0140C7A.

The CSI for EVAP family CADXR0140C7A was revised to reflect corrected dyno coefficients.

Bill Rodgers

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 1/27/2011 7:56:19 PM  
**Subject:** Volkswagen - Application submission for Test Group CADXJ02.03UB  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We have submitted to Verify the manufacturer fuel economy retests needed for Audi test group CADXJ02.03UB.

The Application for Certification and the two certification requests, for EVAP families CADXR0140B8Q and CADXR0140C7A, have also been submitted for your review.

Best regards,

Bill Rodgers

Engineering and Environmental Office

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Rochester Hills, MI

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(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 2/7/2011 7:50:03 PM  
**Subject:** VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8

Hello Jim,

Just a "heads up" for a new test waiver request.

The Audi A8L has a new body for MY 2012. This particular version is equipped with a new 6.3l normally aspirated W12 engine and an eight speed automatic transmission.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Mon 2/7/2011 9:44:56 PM  
**Subject:** Recent Submission RE: SCR and AECD

Hello Jim:

Just a heads-up. I have submitted a document through VERIFY that is a request for approval of a diesel SCR system and description of AECDs. This document applies to the 2.0L TDI diesel that will be in the new Passat for 2012MY. You may recall that the 2.0L TDI in the Golf/Jetta uses a NOx storage catalyst (w/o SCR) and the 3.0L V6 TDI in the VW Touareg and Audi Q7, uses SCR. So, this is our first 2.0L TDI using an SCR system.

Please let me know if there are any questions. We will have some folks from Germany in the US next week if we need to discuss this topic.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 2/8/2011 3:45:30 PM  
**Subject:** RE: VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8

Hello Jim,

The "heads up" was a little premature. Some yet undiscovered problem with the Verify System has rejected submission. I am waiting for a solution from the helpdesk.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 07, 2011 2:50 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: VW Group: New Test Waiver Request for VW Test Group CVWXV06.3UA8

Hello Jim,

Just a "heads up" for a new test waiver request.

The Audi A8L has a new body for MY 2012. This particular version is equipped with a new 6.3l normally aspirated W12 engine and an eight speed automatic transmission.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 2/17/2011 3:26:01 PM  
**Subject:** VW - Revisions to MY 2010 Audi Final applications

Hello Jim,

Today we uploaded revisions of the final applications for a total of five MY2010 Audi test groups. These revisions had an update to the parts list in section 21.

Updated CBI and FO final applications were uploaded for the following test groups:

AADXJ03.23UC

AADXV02.03PA

AADXV02.03UA

AADXV02.03UB

AADXV03.03UF

Please contact me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 2/25/2011 7:38:06 PM  
**Subject:** VW Group - CVWXV03.6U41 submittals  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I have submitted Test Information and Decision Information to Verify for the above mentioned test group. This represents the 3.6L VR6 (Bin 5 / ULEV-II) version of the 2012 Passat, already certified with the 2.5L 5-cylinder engine. The test group includes one vehicle configuration using existing technology 3.6L VR6 engine and 6-speed Front-drive DSG transmission, however this is the first model available with this engine/transmission combination. The EVAP family is a carryover from the previous model year VW Passat. This new test group will also be included in VW Group's Cold NMHC compliance phase-in for 2012.

Please let me know if you have any questions.

Thanks,

Bill Rodgers

Engineering and Environmental Office

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(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 2/28/2011 3:21:09 PM  
**Subject:** VW Group - BVWXV03.6U41  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

The Supplemental Information has been submitted for the following vehicle selected for confirmatory testing:

VW Passat 3.6L

Vehicle ID: 411 10206 /12

Bill Rodgers

Engineering and Environmental Office

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(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 3/3/2011 9:28:39 PM  
**Subject:** RE: VW Request for Approval - SCR and AECD

Jim –

Okay, thanks for checking.

**Ex. 7**

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Thursday, March 03, 2011 1:39 PM  
**To:** Ex. 7  
**Subject:** Re: VW Request for Approval - SCR and AECD

Hi Ex. 7 I saw your note and I haven't forgotten. I gave it a quick look but I need to set aside some time and go through it. I will make it a point to complete my evaluation of it next week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Ex. 7  
**To:** Jim Snyder/AA/USEPA/US@EPA

**Date:** 03/03/2011 10:48 AM

**Subject:** VW Request for Approval - SCR and AECD

Hello Jim:

In mid-February I submitted a document that describes the SCR system in the 2012 New Passat with 2.0L TDI Diesel. The document also contains information about AECDs for this engine concept. This is the mid-size sedan vehicle that will be produced beginning in late April in the new plant in Chattanooga, TN.

I was wondering whether you have had a chance to look at the information and if you find it acceptable or have further questions or concerns.

Please let me know.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/8/2011 2:31:50 PM  
**Subject:** VWGoA Revised application submitted CNLXV06.5L83

Hello Jim,

Just a heads up that we have submitted a revised application today for a running change (related to new catalyst and model name change). This is for Lamborghini test group CNLXV06.5L83. We are requesting a revised certificate.

Please let me know if you have any questions on this.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 3/9/2011 12:52:10 PM  
**Subject:** RE: VW Group Decision Information submissions for TG: CVWXV02.03PA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim.

We have a test QA process that flags any manufacturer retests necessary based on the current EPA parameters. We will always try to mention them to you for your confirmatory test decision information.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, March 08, 2011 5:50 PM  
To: Rodgers, William  
Subject: Re: VW Group Decision Information submissions for TG: CVWXV02.03PA

Thanks, yes I saw the highway test flagged. Glad to read that you plan to test it. I was going to wait and see if you did it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/08/2011 02:57 PM  
Subject: VW Group Decision Information submissions for TG: CVWXV02.03PA

Hi Jim,

We submitted today two Decision Information data sets for test group CVWXV02.03PA. These are related to a forthcoming Running Change to add the Jetta model to this existing Bin 3/ SULEV (PZEV) test group.

No new technology is included with this model. The manual transmission configuration does require a HWY retest do to high fuel economy for the ETW.

Vehicle ID: VW361 00464 (Jetta manual trans)  
VW465 00127 (Jetta automatic trans)

Best regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

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To: Jim.Snyder/AA/USEPA/US@EPA  
Cc: Ex. 7  
From: Ex. 7  
Sent: Wed 3/9/2011 4:39:26 PM  
Subject: VWGoA - Field Fix documents for MY 2004 test groups 4VWXV2.0234 / 4VWXV01.9236  
CBI 4VWXV02.0234 APP F04 R00.PDF  
CBI 4VWXV01.9236 APP F10 R00.PDF

Hello Jim,

Today we prepared two field fix letters which we could not upload through Verify. The problem is that they are for MY 2004, whereas list in Verify only goes to 2005 ( I am told Verify previously had earlier MY available). So instead of using Verify, I am sending the documents to you as PDF attachments in this email.

If there is a better way to handle this should it occur in the future, please let me know.

Regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/10/2011 9:12:11 PM  
**Subject:** VWGoA Decision Information Submitted

Hello Jim,

We have added a new model (Jetta GLI, both automatic and manual configurations) for test group CADXJ02.03UA. This test group is a carryover test group and has already been certified. A running change will also be submitted for the addition of the new model.

We have already submitted vehicle information, test data and Decision Information for both transmissions of this model. Note, this model is not a new worst case vehicle and has no new technology.

Please note, one manufacturer re-test is required (for the automatic configuration: HWFE / High FE for ETW).

We would greatly appreciate your response on this as soon as possible. Please let me know if you have any questions regarding this submission.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 3/14/2011 1:21:26 PM  
**Subject:** RE: VWGoA Decision Information Submitted

Hello Jim,

Just to confirm, we did receive the waiver confirmation for this Friday afternoon. Thanks again for your help.

There is one item I need to clarify – the running change that will be submitted is because of the addition of a new carline (Beetle). I just wanted to clarify that detail since the Jetta GLI will remain in the Jetta carline as a carryover. I had misunderstood this Friday when we talked.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



From: Giles, Michael  
Sent: Thursday, March 10, 2011 4:12 PM  
To: Snyder, Jim  
Cc: Rodgers, William; Hart, Robert (VWoA)  
Subject: VWGoA Decision Information Submitted

Hello Jim,

We have added a new model (Jetta GLI, both automatic and manual configurations) for test group CADXJ02.03UA. This test group is a carryover test group and has already been certified. A running change will also be submitted for the addition of the new model.

We have already submitted vehicle information, test data and Decision Information for both transmissions of this model. Note, this model is not a new worst case vehicle and has no new technology.

Please note, one manufacturer re-test is required (for the automatic configuration: HWFE / High FE for ETW).

We would greatly appreciate your response on this as soon as possible. Please let me know if you have any questions regarding this submission.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 3/14/2011 3:38:01 PM  
**Subject:** VW Group \_ 3-03-2011 Certificate request for TG CVWXV02.03PA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

I wanted to alert you to a revision I am making to a CARLINE name found in the Section 7 CSI for Test group: CVWXV02.03PA, Evap family CVWXR0110D37. This will affect the Certificate requested on 3/11/11.

The carline New Beetle has been changed to "Beetle" and should appear on the Certificate as such.

A revised application is in process and will be submitted this morning.

Regards,

Bill Rodgers

Engineering and Environmental Office

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Rochester Hills, MI

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(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA; **Ex. 7** @arb.ca.gov>[]  
**From:** **Ex. 7**  
**Sent:** Wed 3/16/2011 7:03:17 PM  
**Subject:** 2.0L TDI - Volkswagen Requests for Approval

Hello Jim and **Ex. 7**

Just a heads-up. I have submitted a request for approval of the upward and downward DPF regeneration adjustment factors for the 2012 model year 2.0L TDI test group CVW XV02.0U4S. The request was submitted to EPA and ARB through VERIFY and DMS respectively. These factors are determined as we have done so in the past for our DPF-equipped diesels.

Your attention to this matter would be appreciated. I would also appreciate an update on the status of the review of the SCR/AECD submittal for this test group.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 3/16/2011 10:09:43 PM  
**Subject:** Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I wish to inform you that I have submitted, via VERIFY, a request for approval of a Lamborghini Bench Cycle. The cycle would be used for their V12 engine concept. The technical information is provided in the form of a slide presentation. If there are any questions, I can forward these back to Lamborghini. Further, Lamborghini technical staff is available to participate in a telephone conference if there are any detailed questions. I can easily set this up.

There is some urgency associated with the request for approval, so your attention to this matter would be appreciated.

Best regards,

**Ex. 7**

P.S. Arvon – I assumed that you are still involved in this topic, but if I am not correct, please let me know.

---

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/17/2011 11:31:21 AM  
**Subject:** Lamborghini Revised Certificate Request - CNLXV06.5L83

Hello Jim,

As a follow up to our discussion, I have submitted a request for a "new" certificate for the above test group (although it should be a revision - "new" was the only option).

Please let me know if you received this, since I have not received a confirmation email .

To summarize the reasons for the revised certificate request:

- 1) Name change from 834 to Aventador
- 2) New catalyst configuration (there will now be both 4 and 6 catalysts configurations).

Thanks for your help, please call me if you have any questions.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/17/2011 7:14:47 PM  
**Subject:** VW Group - Running Change and Revised Certificate request for CADXJ02.03UA

Hello Jim,

Today I have submitted the following items related to the addition of the Beetle to test group CADXJ02.03UA:

- 1) Running change letter for addition of Beetle model (carline) to the test group.
- 2) Revised application document
- 3) New request for certificate for combination of test group CADXJ02.03UA and evaporative family CADXR0110238 (note that the current certificate number is CADXJ021.03UA-002).

Please contact me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/20/2012 12:07:16 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10 ). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:46 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/19/2012 04:38 PM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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The available date is September 17th.

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Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

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snyder.jim@epa.gov

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Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

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Please let me know if you have any questions processing this request.

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Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 6/20/2012 12:26:35 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Sorry for the confusion guys. The Certification Preview cover letter (I created) did describe it as a plug-in hybrid as originally planned, however those plans have been delayed. The 2013 model year vehicle is not a plug in.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 8:07 AM  
To: Jim Snyder  
Cc: Rodgers, William (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10 ). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks

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United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/20/2012 12:55:59 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

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Regards

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Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.

Regards,

Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 8:56 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/20/2012 5:32:45 PM  
**Subject:** re: 2013 FE Guide - data in Verify as of 6/15/2012 attached; some have errors  
[VW Group-2013 FE Guide-rel10-all-rel-dates-no-sales-6-15-2012.xlsx](#)

Richard,

Attached is a spreadsheet with all the 2013 FE Label data in Verify as of 6/15/2012.

The data highlighted in green have errors. Please correct the errors when you get a chance.

Note that I'm still sending releasable error-free data to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) on the 1st and 15th of the month.

Thanks



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]; erify Help Desk [verifyhelp@csc.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 6/21/2012 12:04:27 PM  
**Subject:** FW: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)  
[VW351 780169-09.pdf](#)  
[9VWX09009738 EPA US06.xml](#)

Hello Jim,

The attached US06 EPA confirmatory test only includes one Fuel Economy bag result instead of the required two bags and is preventing the Verify system from calculating a litmus value. This issue is preventing us from submitting fuel economy labels in Verify for 8 different 2013 models, soon to be introduced to the market. Please investigate how to correct this issue as soon as possible and let us know if our involvement is needed.

Regards,

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
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(248) 754-4219  
william.rodgers@vw.com

-----Original Message-----

From: Thomas, Richard (EEO)  
Sent: Thursday, June 21, 2012 6:06 AM  
To: Giles, Michael (EEO); Rodgers, William (EEO)  
Subject: FW: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)  
Importance: High

More corrections for the 2.0L TDI test group requiring a new certificate.

-----Original Message-----

From: [REDACTED] [REDACTED]@csc.com] On Behalf Of Verify Help Desk  
Sent: Wednesday, June 20, 2012 6:27 PM  
To: Thomas, Richard (EEO)  
Subject: Re: 2012 Volkswagen Index Derived 5-cycle and Litmus (HLP-2668)

Hello Mr. Thomas,

Business rule LD-FE-GL-BR119 was returned with your fuel economy label submission because the EPA Highway Litmus Value was not calculated for the Test Group DVWXV02.0U5N. The reason that the EPA Highway Litmus Value was not calculated is because the Test Information Number 9VWX09009738 does not contain a test result for FE BAG 2 (Bag 2 Fuel Economy) which is used in the calculations.

In order to have the EPA Highway Litmus Value calculated you will need to make a Correction for Test

#9VWX09009738 and be sure to add an emission result for FE BAG 2 (Bag 2 Fuel Economy). If you do not have access to the test information submission file you may request a test information dataset report to see the data that should be entered for the Correction. To request a dataset report navigate to: MyCDX > Light-Duty Vehicle & Truck > Vehicle, Fuel Properties, & Tests > Request Dataset Report (in Test Information section).

You will then need to make a Correction to your test group in order for the calculation to be made and for you to see the EPA Highway Litmus Value on your CSI.

After the test group submission is accepted, please make a lock request and answer "Yes" to the question "New Certificate Needed?" You can also add a comment in the comment box above this question that you are requesting a revised certificate for your fuel economy submission.

Please contact your EPA Cert Rep and have them issue the revised certificate.

Please try your fuel economy label submission again and let me know if it is accepted.

**Ex. 6**

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

Verify Help Desk

Sent by: **Ex. 6**

**Ex. 6**

To

"Thomas, Richard (EEO)"

<Richard.Thomas@vw.com>

06/20/2012 11:49

cc

AM

Subject

Re: 2012 Volkswagen Index Derived

5-cycle and Litmus(Document link:

Verify Help Desk)

Hello Mr. Thomas,

We are still looking into this issue. It does appear that you are correct.

Verify did not calculate the EPA Highway Litmus value. We will let you know soon what is required for Verify to do so.

**Ex. 6**

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard  
(EEO)"

<Richard.Thomas@v  
w.com> To

Verify Help Desk@CSC

cc

06/19/2012 02:17

PM

Subject

2012 Volkswagen Index Derived

5-cycle and Litmus

Hello **Ex. 6**

I am having difficulty with a number of Diesel concept derived 5-cycle labels due to the following error. The test group DVWXV02.0U5N and CSI information report has no "EPA Highway Litmus Value. I think that may be the cause of the following business rule message.

Transaction Status Details

Transaction Status Identifier : REJECTED Transaction Message Text : LD-FE-GL-BR119 - If Fuel Economy Label Calculation Approach (GL-79) is equal to '5C-DRV' (Derived 5-cycle), and MDPV-Only or ICI Indicator (GL-200) equals 'N' (No), and the Test Group (GL-126) specified in the subconfiguration sales section contains a Test Group Fuel (TG-217.1) equal to 'G' (Gasoline) or 'D' (Diesel), then Test Group (GL-126) must have valid values (non-Null) for EPA City Litmus Value (TG-219.3.1), EPA City Litmus Threshold (TG-219.3.2), EPA Highway Litmus Value (TG-219.4.1), and EPA Highway Litmus Threshold (TG-219.4.2), and EPA City Litmus Value (TG-219.3.1) must be greater than or equal to EPA City Litmus Threshold (TG-219.3.2), and EPA Highway Litmus Value (TG-219.4.1) must be greater than or equal to EPA Highway Litmus Threshold (TG-219.4.2).  
(Base Level IWC = 3500) (Config Index = 1) (SubConfig Index = 1) (Test Group (GL-126) = DVWXV02.0U5N)

Transaction Identifier: \_a784ac70-de02-4aca-870a-d094bd36e386

I have several derived 5-cycle Diesel labels that are in this test group and I need to resolve this as soon as possible.

Best regards,  
Richard

```
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="https://cdxnodengn.epa.gov/verify/xslt/processing_report.xslt"?>

<TestInformationSubmission xmlns="urn:us:net:exchangenetwork:Verify">
  <TestInformationDetails>
    <InformationProcessCode>C</InformationProcessCode>
    <TestNumberIdentifier>9VWX09009738</TestNumberIdentifier>
    <EPAManufacturerCode>VWX</EPAManufacturerCode>
    <VehicleIdentificationText>VW351 780169/09</VehicleIdentificationText>
    <VehicleConfigurationNumber>2</VehicleConfigurationNumber>
    <TestDataDetails>
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      <TestFuelTypeIdentifier>19</TestFuelTypeIdentifier>
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      <CorrectionUnitsCode>M</CorrectionUnitsCode>
      <AnalyticallyDerivedIndicator>N</AnalyticallyDerivedIndicator>
      <FourWheelDriveDynamometerIndicator>N</FourWheelDriveDynamometerIndicator>
      <EPADynamometerNumberText>D329</EPADynamometerNumberText>
      <DieselAdjustmentFactorUsageIndicator>U</DieselAdjustmentFactorUsageIndicator>
      <ManufacturerCommentText>THIS TEST HAS PARTICULATE RESULTS. [NMOG=NMHC] TSD-LCS TEST#: (8) 13-6003, EPA FE Calc Rel8</ManufacturerCommentText>
      <EmissionTestDetails>
        <TestResultIdentifier>HC-NM+NOX</TestResultIdentifier>
        <UnroundedResultValue>0.1283183</UnroundedResultValue>
      </EmissionTestDetails>
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        <TestResultIdentifier>NOX</TestResultIdentifier>
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      </EmissionTestDetails>
    </TestDataDetails>
  </TestInformationDetails>
</TestInformationSubmission>
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 </EmissionTestDetails>  
 <EmissionTestDetails>  
 <TestResultIdentifier>MFR FE</TestResultIdentifier>  
 <UnroundedResultValue>33.5</UnroundedResultValue>  
 </EmissionTestDetails>  
 <EmissionTestDetails>  
 <TestResultIdentifier>NMOG</TestResultIdentifier>  
 <UnroundedResultValue>0.0037436</UnroundedResultValue>  
 </EmissionTestDetails>  
 <EmissionTestDetails>  
 <TestResultIdentifier>FE BAG 1</TestResultIdentifier>  
 <UnroundedResultValue>33.49</UnroundedResultValue>  
 </EmissionTestDetails>  
 <EmissionTestDetails>  
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United States Environmental Protection Agency

NVFEL

Ann Arbor, Michigan 48105

**FAX TO:** Len Kata

**FAX NUMBER:** 248 754-4207

**PHONE NUMBER:** 248 754-4204

**LOCATION:** Volkswagen Engineering & Environmental Office

**FROM:** Bruce Sdunek

**FAX NUMBER:** 734 214 4869

**PHONE NUMBER:** 734 214 4733

**DIVISION:** Certification & Compliance Division

**DATE:** May 21, 2008

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MESSAGE: Len,

Here are the preliminary results for the VW Diesel.

Bruce Sdunek


Certification and Compliance Division

Environmental Protection Agency

cdrecurred

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C15D

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data							
Test Information				Vehicle ID: VW351 780169/09			
	Test Date: 5/20/2008			MFR Name: VOLKSWAGEN			
	Key Start / Hot Soak: 09:59:06 / 09:52			MFR Code: 590			
	Operator: 62423			Config #: 00			
	Fuel Container ID: F0024C			Transmission: AUTO			
	Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)			Shift Schedule: A09980005			
	Test Procedure: 02 CVS 75-Later (w/o Can Load) (ftp3bag)			Odometer: 004377.0 MI			
Calculation Method: Diesel			Drive Schedule: ftp3bag				
Pretest Remarks:			Soak Period: 19.8 hours				
Quality Control: QC Exceptions have been identified and noted							
<b>Bag Data</b>							
<b>Phase 1</b>		THC / IntTHC (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample		8.926 / 8.956	21.079	0.672	0.744	5.908	
Ambient		2.266	0.264	0.008	0.045	1.914	
Net Concentration		6.766 / 6.817	20.830	0.665	0.702	4.101	1.982
Remarks: <u>Filt A Excluded from Wghtd</u>							
<b>Phase 2</b>							
Sample		3.505 / 3.435	0.373	0.026	0.467	2.999	
Ambient		2.226	0.091	0.004	0.043	1.901	
Net Concentration		1.357 / 1.286	0.284	0.022	0.425	1.165	-0.087 Warning
Remarks: <u>Filt A Excluded from Wghtd</u>							
<b>Phase 3</b>							
Sample		3.003 / 2.915	0.411	0.197	0.644	2.553	
Ambient		2.333	0.076	0.005	0.042	1.920	
Net Concentration		0.782 / 0.694	0.339	0.192	0.603	0.725	-0.160 Warning
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: <u>This test has particulate results.</u>							
<b>Results</b>							
	THC / IntTHC (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC (gpm)	Vol MPG (mpg)
Phase 1	- / 0.087	0.539	0.025	285.2	0.061	0.025	35.364
Phase 2	- / 0.026	0.012	0.001	275.6	0.028	0.000	36.588
Phase 3	- / 0.009	0.009	0.007	244.6	0.011	0.000	41.388
Weighted	0.03421	0.12039	0.00794	269.567	0.02885	0.00527	
							<NMOG=NMHC>
<b>Fuel Economy</b>							
	Diesel MPG	<u>Filt A Excluded f</u>			Dyno Settings	Dyno #: D329	
Phase 1	35.54				Inertia: 3750		
Phase 2	36.77				EPA Set Co A: 18.38		
Phase 3	41.60				EPA Set Co B: -0.1203		
					EPA Set Co C: 0.02109		
Weighted	37.65				Front / Rear / Drive Tire PSI: 35 / 35 / 35		
					Emissions Bench: D329		


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NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data								
Test Number: 2008-0136-001				Vehicle ID: VW351 780169/09				
	<u>Results</u>	<u>THC / IntTHC</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
	Phase 1	- / 0.313	1.930	0.090	1021.5	0.218	0.091	1.179
	Phase 2	- / 0.101	0.045	0.005	1060.3	0.105	0.000	
	Phase 3	- / 0.032	0.031	0.026	876.4	0.038	0.000	
	Phase 4							
<b>Test Conditions</b>								
		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
	Barometer (InHg)	28.67	28.67	28.66				
	Avg Cell Temp (degF)	71.70	71.76	71.67				
	Dew Point (degF)	47.54	46.90	46.20				
	Specific Humidity (grains/lbm)	50.95	49.72	48.41				
	NOx Corr Factor	0.8984	0.8938	0.8659				
	CO2 Dilution Factor	17.946	28.693	20.806				
	CFV Vmix (scf @68F)	2787.69	4773.81	2780.80				
	Total Vmix (scf @68F)	2809.90	4812.04	2803.01				
	CVS Flow Rate Avg (scfm)	330.29	329.27	329.15				
	CVS-SFV Exh Flow Avg (scfm)							
	Fan Placement: One Fan - Up - Front							
	Phase Time (secs)	506.40	869.90	506.90				
	Distance (miles)	3.562	3.833	3.583				
	Bag Analysis Time (secs)	950.4	147.9	89.3				
	<u>Data Quality Flags</u>	QC Exceptions have been identified and noted <i>2/s checks OK 5-21-08</i> QC EXCEPTION: -PSU A Exception - - <i>Filter A is excluded as shown in remarks 5/21/08</i>						
	<u>MFR Test Results</u> for Procedure 2 CVS 75 AND LATER (W/O CAN. LOAD)							
	<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
	1084705	0.0437	0.02	0.022	274	0	0.0034	
	<u>Odometer</u>	<u>MPG</u>						
	4142 M	37.1						
	MPG is -1.45 % lower than EPA MPG			MFR Lab: Volkswagen AG, Dept. E/TZ-TZ D3280 Wolfsburg 1, Germany				
				Dyno: 08				
				Fuel: 19 CERT DIESEL (8 - 15 PPM SULFUR)				
	I have validated the data in accordance with the requirements of TP 730							
	Validated By: <u>62423</u>		Date: <u>5-21-08</u>					

NVFEL Laboratory Test Data							PARTICULATE	
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data								
Test Number: 2008-0136-001			Vehicle ID: VW351 780169/09					
Test Date: 5/20/2008			MFR Name: VOLKSWAGEN					
Key Start: 09:59:06 / 09:52			MFR Code: 590					
Operator: 62423			Config #: 00					
Fuel Container ID: F0024C			Transmission: AUTO					
Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)			Shift Schedule: A09980005					
Test Procedure: 02 CVS 75-Later (w/o Can Load) (ftp3bag)			Odometer: 004377.0 MI					
Calculation Method: Diesel			Drive Schedule: ftp3bag					
Pretest Remarks:			Soak Period: 19.8 hours					
Quality Control: QC Exceptions have been identified and noted								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / ml	Filter comment
<b>Phase 1</b>								
	A	8004710	148.6294	148.6693	0.03954	15.096	4.214	
	B	8004711	153.5917	153.6318	0.03972	15.039	4.198	
	C	8004712	148.0566	148.0937	0.03674	13.903	3.881	
Remarks: <u>Filter A Excluded from Weight</u>								
<b>Phase 2</b>								
	A	8004713	150.3360	150.3400	0.00359	1.365	0.356	
	B	8004714	150.0153	150.0196	0.00389	1.466	0.382	
	C	8004715	149.1184	149.1231	0.00430	1.618	0.422	
Remarks: <u>Filter A Excluded from Weight</u>								
<b>Phase 3</b>								
	A	8004716	145.3921	145.3962	0.00371	1.403	0.392	
	B	8004717	149.4850	149.4834	0.00000	0.000	0.000	
	C	8004718	146.2068	146.2100	0.00270	1.025	0.286	
Remarks:								
<b>Phase 4</b>								
Remarks: <u>This test has particulate results.</u>								
<b>Average Results</b>					<u>Net Wt</u>	<u>Total Mass</u>	<u>Total Mass</u>	
					mg	mg	mg / ml	
	Phase 1				0.03867	14.471	4.040	
	Phase 2				0.00393	1.542	0.402	
	Phase 3				0.00214	1.214	0.339	
Weighted: derived from filters in sampler A:							1.16725	
Weighted: derived from filters in sampler B:							1.06972	
Weighted: derived from filters in sampler C:							1.10341	
Weighted All Filters:							1.14048	
<b>Reference Filter Stability Check</b>					<u>Net Wt</u>	<u>Stability Check</u>	<u>Dyno #:</u>	
2% of Avg Net or 0.01 mg					mg	PASS/FAIL	Inertia: 3750	
	No.		<u>Tare</u> (Pre Wt)	<u>Gross</u> (Post Wt)			EPA Set Co A: 18.38	
	0.01	1	149.21840	149.21700	-0.00140	PASS	EPA Set Co B: -0.1203	
		2	148.21290	148.21230	-0.00060	PASS	EPA Set Co C: 0.02109	
							Drive Tire PSI: 35 / 35 / 35	
							Emissions Bench D329	
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NVFEL Laboratory Test Data						PARTICULATE
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data						
Test Number: 2008-0136-001						Vehicle ID: VW351 780169/09
<b>WEIGHING CHAMBER</b>						
	Date	Time	Operator (id)	Chamber Temp (°F)	Humidity (%)	Last Change in Status Status @ timestamp
Pre-test	5/19/08	12:48:00	021616	71.4	44.3	NORM @ 05/19/08 10:37:28
Post-test	5/20/08	13:00:00	021616	71.3	45	NORM @ 05/19/08 10:37:28
<b>Test Conditions</b>						
			Phase 1	Phase 2	Phase 3	Phase 4
	Barometer (InHg)		28.67	28.87	28.66	
	Avg Cell Temp (degF)		71.70	71.76	71.67	
	Dew Point (degF)		47.54	46.90	46.20	
	Specific Humidity (grains/lbm)		50.95	49.72	48.41	
	NOx Corr Factor		0.8984	0.8938	0.8889	
	Dilution Factor		17.95	28.69	20.81	
	CFV Vmix (scf @68F)		2787.69	4773.81	2780.80	
	Sample Volume A (scf @68F)		7.361	12.671	7.407	
	Sample Volume B (scf @68F)		7.422	12.789	7.414	
	Sample Volume C (scf @68F)		7.425	12.771	7.382	
	Sample Volume Average (scf @68F)		7.402	12.743	7.404	
	Total Vmix (scf @68F)		2809.90	4812.04	2803.01	
	Phase Time (sec)		506.40	869.90	506.90	
	Distance (miles)		3.582	3.833	3.583	
						Min/Max Limit Checks
	PSU Probe A (degC)		61.5	61.5	61.5	
	PSU Probe B (degC)		34.3	34.3	34.4	
	PSU Probe C (degC)		34.3	34.3	34.4	
	PSU Dil Air A (degC)		39.5	39.1	39.1	
	PSU Dil Air B (degC)		32.4	37.8	37.9	
	PSU Dil Air C (degC)		40.8	40.1	39.9	
	PSU Filter A (degC)		43.1	42.0	43.5	P1 41.7/- P2 41.0/-
	PSU Filter B (degC)		44.8	47.0	45.5	
	PSU Filter C (degC)		45.2	44.8	44.7	
	PSU Dil Flow A (lpm)		25.1	25.1	25.0	
	PSU Dil Flow B (lpm)		25.0	24.9	25.0	
	PSU Dil Flow C (lpm)		25.0	24.9	25.1	
	PSU A Proportionality					
	PSU B Proportionality					
	PSU C Proportionality					
<b>Data Quality Flags</b> Filter room ambient conditions were within QC limits; Filter net weights include buoyancy corrections.						
QC Exceptions have been identified and noted						
<b>QC EXCEPTION: -PSU A Exception -</b> Filter A is excluded as shown in remarks on 5/2/08						
I have validated the data in accordance with the requirements of TP 730						
Validated By: <u>62423</u> Date: <u>5-21-08</u>						


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CISD

NVFEL Laboratory Test Data								CVS																																															
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data																																																							
Test Number: 2008-0136-002				Vehicle ID: VW351 780169/09																																																			
	Test Date: 5/20/2008				MFR Name: VOLKSWAGEN																																																		
	Key Start: 11:18:19				MFR Code: 590																																																		
	Operator: 62423				Config #: 00																																																		
	Fuel Container ID: F0024C				Transmission: AUTO																																																		
	Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)				Shift Schedule: A09980011																																																		
	Test Procedure: 03 HWFET (hwfetprep_hwfet)				Odometer: 004388.0 MI																																																		
	Calculation Method: Diesel				Drive Schedule: hwfet_hwfet																																																		
Pretest Remarks:																																																							
Quality Control: QC Exceptions have been identified and noted																																																							
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NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data							
Test Number: 2008-0136-002				Vehicle ID: VW351 780169/09			
<b>Results</b>	<b>THC / IntTHC</b> (grams)	<b>CO</b> (grams)	<b>NOx</b> (grams)	<b>CO2</b> (grams)	<b>CH4</b> (grams)	<b>NMHC</b> (grams)	<b>Meth Response</b> 1.179
 Phase 1 Phase 2 Phase 3 Phase 4	- / 0.022	0.078	0.047	1854.6	0.040	0.000	
<b>Test Conditions</b>							
		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>		
Barometer (InHg)		28.66					
Avg Cell Temp (degF)		71.47					
Dew Point (degF)		46.53					
Specific Humidity (grains/lbm)		49.03					
NOx Corr Factor		0.8912					
CO2 Dilution Factor		21.448					
CFV Vmix (scf @68F)		6088.57					
Total Vmix (scf@68F)		6122.04					
CVS Flow Rate Avg (scfm)		477.47					
CVS-SFV Exh Flow Avg (scfm)							
Fan Placement:	One Fan - Up - Front						
Phase Time (secs)		765.10					
Distance (miles)		10.237					
Bag Analysis Time (secs)		311.6					
<b>Data Quality Flags</b>							
QC Exceptions have been identified and noted <i>Z/s checks OK MP 5-21-08</i>							
<b>MFR Test Results</b> for Procedure 3 HWFE (HIGHWAY TEST)							
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
1084706	0.0088	0	0.005	184	0	0.0004	
<u>Odometer</u>	<u>MPG</u>				MFR Lab: Volkswagen AG, Dept. E/TZ-TZ		
4153 M	55.3				D3280 Wolfsburg 1, Germany		
MPG is -1.53 % lower than EPA MPG			Dyno: 08				
			Fuel: 19 CERT DIESEL (8 - 15 PPM SULFUR)				
I have validated the data in accordance with the requirements of TP 730							
Validated By: <i>62423</i>				Date: <i>5-21-08</i>			

NVFEL Laboratory Test Data						PARTICULATE	
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data							
Test Number: 2008-0136-002				Vehicle ID: VW351 780169/09			
	Test Date: 5/20/2008			MFR Name: VOLKSWAGEN			
	Key Start: 11:18:19			MFR Code: 690			
	Operator: 62423			Config #: 00			
	Fuel Container ID: F0024C			Transmission: AUTO			
	Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)			Shift Schedule: A09980011			
	Test Procedure: 03 HWFET (hwfprep_hwfet)			Odometer: 004389.0 Mi			
Calculation Method: Diesel			Drive Schedule: hwfet_hwfet				
Pretest Remarks:							
Quality Control: QC Exceptions have been identified and noted							
<u>Particulate</u>	<u>Filter</u>	<u>Filter</u>	<u>Tare</u>	<u>Gross</u>	<u>Net Wt</u>	<u>Total Mass</u>	<u>Total Mass</u>
	Sampler	No.	(Pre Wt)	(Post Wt)	mg	mg	mg / mi
<u>Phase 1</u>	A	8004707	144.9075	144.9112	0.00305	1.685	0.165
	B	8004708	146.5781	146.8831	0.00435	2.371	0.232
	C	8004709	148.4210	148.4243	0.00264	1.447	0.141
Remarks:							
<u>Phase 2</u>							
Remarks:							
<u>Phase 3</u>							
Remarks:							
<u>Phase 4</u>							
Remarks: <u>This test has particulate results.</u>							
<u>Average Results</u>					<u>Net Wt</u>	<u>Total Mass</u>	<u>Total Mass</u>
					mg	mg	mg / mi
Phase 1					0.00335	1.834	0.179
<u>Reference Filter Stability Check</u>							
		<u>Tare</u>	<u>Gross</u>	<u>Net Wt</u>	<u>Stability Check</u>	<u>Dyno #:</u> D329	
2% of Avg Net or 0.01 mg		No.	(Pre Wt)	(Post Wt)	mg	Inertia: 3750	
0.01		1	149.21590	149.21750	0.00160	EPA Set Co A: 18.38	
		2	146.21010	146.21370	0.00360	EPA Set Co B: -0.1203	
						EPA Set Co C: 0.02109	
						DriveTire PSI: 35 / 35 / 35	
						Emissions Bench D329	
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NVFEL Laboratory Test Data						PARTICULATE
Final Laboratory Test Results - Refer to CFEIS Reports for Official Data						
Test Number: 2008-0136-002				Vehicle ID: VW351 780169/09		
<b>WEIGHING CHAMBER</b>						
	Date	Time	Operator (Id)	Chamber Temp (°F)	Humidity (%)	Last Change in Status Status @ timestamp
Pre-test	5/19/08	11:54:00	021616	71.2	43.6	NORM @ 05/19/08 10:37:28
Post-test	5/20/08	13:53:00	021616	71.5	44.9	NORM @ 05/19/08 10:37:28
<b>Test Conditions</b>						
		Phase 1	Phase 2	Phase 3	Phase 4	
	Barometer (InHg)	28.88				
	Avg Cell Temp (degF)	71.47				
	Dew Point (degF)	46.53				
	Specific Humidity (grains/lbm)	49.03				
	NOx Corr Factor	0.8912				
	Dilution Factor	21.45				
	CFV Vmix (scf @68F)	6088.57				
	Sample Volume A (scf @68F)	11.095				
	Sample Volume B (scf @68F)	11.222				
	Sample Volume C (scf @68F)	11.158				
	Sample Volume Average (scf @68F)	11.158				
	Total Vmix (scf @68F)	6122.04				
	Phase Time (sec)	765.10				
	Distance (miles)	10.237				
						Min/Max Limit Checks
	PSU Probe A (degC)	61.6				
	PSU Probe B (degC)	34.9				
	PSU Probe C (degC)	34.9				
	PSU Dil Air A (degC)	39.5				
	PSU Dil Air B (degC)	36.7				
	PSU Dil Air C (degC)	40.3				
	PSU Filter A (degC)	44.4				
	PSU Filter B (degC)	49.9				
	PSU Filter C (degC)	44.1				
	PSU Dil Flow A (lpm)	25.0				
	PSU Dil Flow B (lpm)	24.9				
	PSU Dil Flow C (lpm)	24.9				
	PSU A Proportionality					
	PSU B Proportionality					
	PSU C Proportionality					
<b>Data Quality Flags</b> Filter room ambient conditions were within QC limits; Filter net weights include buoyancy corrections.						
QC Exceptions have been identified and noted <i>2/3 checks OK MP 5-21-08</i>						
...						
I have validated the data in accordance with the requirements of TP 730						
Validated By: <i>62423</i> Date: <i>5-21-08</i>						

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NVFEL Laboratory Test Data								CVS
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data								
Test Number: 2008-0136-003				Vehicle ID: VW351 780169/09				
	<b>Results</b>	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
		(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
	Phase 1	- / 0.865	0.138	0.996	2427.2	0.839	0.030	1.179
	Phase 2							
	Phase 3							
	Phase 4							
<b>Test Conditions</b>			<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>		
Barometer (InHg)			28.65					
Avg Cell Temp (degF)			71.13					
Dew Point (degF)			47.84					
Specific Humidity (grains/lbm)			51.55					
NOx Corr Factor			0.9007					
CO2 Dilution Factor			15.360					
CFV Vmix (scf @68F)			5607.58					
Total Vmix (scf@68F)			5633.84					
CVS Flow Rate Avg (scfm)			558.90					
CVS-SFV Exh Flow Avg (scfm)								
Fan Placement: US08 Only - One Large Fan - Down - Front								
Phase Time (secs)			602.00					
Distance (miles)			7.999					
Bag Analysis Time (secs)			87.5					
<b>Data Quality Flags</b>		This data meets all automated quality control checks. No problems were identified.						
<b>MFR Test Results</b> for Procedure 90 US08								
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>		
1084707	0	0	0	0	0	0		
<u>Odometer</u>	<u>MPG</u>							
4174 M	0							
MFR Lab: Volkswagen AG, Dept. E/TZ-TZ								
D3280 Wolfsburg 1, Germany								
Dyno: 13								
Fuel: 19 CERT DIESEL (8 - 15 PPM SULFUR)								
I have validated the data in accordance with the requirements of TP 730								
Validated By: <u>62423</u>		Date: <u>5-21-08</u>						

NVFEL Laboratory Test Data						PARTICULATE	
Final Laboratory Test Results- Refer to CFEIS Reports for Official Data							
<b>Test Information</b>		Test Date: 5/20/2008		Vehicle ID: VW351 780169/09			
		Key Start: 12:30:49		MFR Name: VOLKSWAGEN			
		Operator: 82423		MFR Code: 590			
		Fuel Container ID: F0024C		Config #: 00			
		Fuel Type: 19 2007 Cert Diesel (8-12 ppm Sulfur)		Transmission: AUTO			
		Test Procedure: 90 US06 (us06warmup_us06)		Shift Schedule: A09980041			
Calculation Method: Diesel				Odometer: 004413.0 MI			
Pretest Remarks:				Drive Schedule: us06_us06			
Quality Control: This data meets all automated quality control checks. No problems were identified.							
<b>Particulate</b>	<b>Filter</b>	<b>Filter</b>	<b>Tare</b>	<b>Gross</b>	<b>Net Wt</b>	<b>Total Mass</b>	<b>Total Mass</b>
	Sampler	No.	(Pre Wt)	(Post Wt)	mg	mg	mg / ml
<b>Phase 1</b>	A	8007423	145.3743	145.3777	0.00281	1.810	0.226
	B	8007424	142.8005	142.8019	0.00082	0.525	0.066
	C	8007425	149.5182	149.5211	0.00229	1.471	0.184
Remarks:							
<b>Phase 2</b>							
Remarks:							
<b>Phase 3</b>							
Remarks:							
<b>Phase 4</b>							
Remarks: This test has particulate results.							
<b>Average Results</b>					<b>Net Wt</b>	<b>Total Mass</b>	<b>Total Mass</b>
					mg	mg	mg / ml
Phase 1					0.00197	1.289	0.159
<b>Reference Filter Stability Check</b>			<b>Tare</b>	<b>Gross</b>	<b>Net Wt</b>	<b>Stability Check</b>	<b>Dyno #:</b>
2% of Avg Net or 0.01 mg			(Pre Wt)	(Post Wt)	mg	PASS/FAIL	Inertia: 3750
0.01	1	149.22050	149.21810	-0.00240	PASS	EPA Set Co A: 18.38	
	2	146.21540	146.21270	-0.00270	PASS	EPA Set Co B: -0.1203	
						EPA Set Co C: 0.02109	
						DriveTire PSI: 35 / 35 / 35	
						Emissions Bench D329	
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NVFEL Laboratory Test Data						PARTICULATE
Final Laboratory Test Results - Refer to CFEIS Reports for Official Data						
Test Number: 2008-0136-003						Vehicle ID: VW351 780169/09
WEIGHING CHAMBER		Operator	Chamber Temp	Humidity	Last Change in Status	
Date	Time	(id)	(°F)	(%)	Status @ timestamp	
Pre-test	5/19/08	11:32:00	021616	71.7	43.6 NORM @ 05/19/08 10:37:28	
Post-test	5/20/08	14:12:00	021616	71.8	44.1 NORM @ 05/19/08 10:37:28	
Test Conditions		Phase 1	Phase 2	Phase 3	Phase 4	
Barometer (inHg)		28.85				
Avg Cell Temp (degF)		71.13				
Dew Point (degF)		47.84				
Specific Humidity (grains/lbm)		51.55				
NOx Corr Factor		0.9007				
Dilution Factor		15.36				
CFV Vmix (scf @68F)		5807.58				
Sample Volume A (scf @68F)		8.738				
Sample Volume B (scf @68F)		8.753				
Sample Volume C (scf @68F)		8.769				
Sample Volume Average (scf @68F)		8.753				
Total Vmix (scf @68F)		5633.84				
Phase Time (sec)		602.00				
Distance (miles)		7.999				
					Min/Max Limit Checks	
PSU Probe A (degC)		61.5				
PSU Probe B (degC)		35.3				
PSU Probe C (degC)		35.8				
PSU Dil Air A (degC)		39.1				
PSU Dil Air B (degC)		36.1				
PSU Dil Air C (degC)		39.5				
PSU Filter A (degC)		45.3				
PSU Filter B (degC)		45.3				
PSU Filter C (degC)		45.1				
PSU Dil Flow A (lpm)		24.7				
PSU Dil Flow B (lpm)		24.7				
PSU Dil Flow C (lpm)		24.7				
PSU A Proportionality						
PSU B Proportionality						
PSU C Proportionality						
<p><u>Data Quality Flags</u> Filter room ambient conditions were within QC limits; Filter net weights include buoyancy corrections.</p> <p>This data meets all automated quality control checks. No problems were identified.</p> <p>---</p> <p>I have validated the data in accordance with the requirements of TP 730</p> <p>Validated By: <u>62423</u> Date: <u>5-21-08</u></p>						

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VW351 780169/09

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U

THIS TEST HAS PARTICULATE RESULTS. [NMOG=NMHC] TSD-LCS TEST#: (8) 13-6003, EPA FE  
Calc Rel8

HC-NM+NOX

0.1283183

NOX

0.1245747

CO2

303.456902

HC-NM

0.0037436

PM

0.0001587

MFR FE

33.5

NMOG

0.0037436

FE BAG 1

33.49

METHANE

0.1048967

HC-TOTAL

0.1106565

CO

0.0172903

20101004

US06

D

US06

33.5411

33.5

HC-NM+NOX

0.1283183

NOX

0.1245747

CO2

303.456902

HC-NM

0.0037436

PM

0.0001587

MFR FE

33.5

NMOG

0.0037436

FE BAG 1

33.49

METHANE

0.1048967

HC-TOTAL

0.1106565

CO

0.0172903

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 6/22/2012 7:39:11 PM  
**Subject:** VW Group - Audi Q5 2.0L TFSI Decision Information

Hello Jim,

Today we submitted a decision information dataset for a new exhaust EDV as a carryover test group for the Audi Q5 2.0L TFSI.

Note, at this is a non- FFV version of the Q5 (same as MY 2012). The FFV version will be classified under a separate test group as discussed in the cert-preview letter. At the time of the preview letter, this non FFV version was not planned, but was later required until the FFV is ready.

Please let us know if you have any questions.

On a second topic, to follow up on the Jetta Hybrid confirmatory test: I had a problem submitting the supplemental information, and I have an open ticket to the help desk to resolve. So, a minor delay in this step for now.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road



Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 6/25/2012 11:10:25 AM  
**Subject:** RE: VW certificate  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim,

The Verify system didn't require a new Certificate to process the FE litmus after the test number was changed to the factory 2-bag test. I'm not sure if a new Certificate request is needed. Any idea?

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, June 21, 2012 5:49 PM  
To: Joel Dalton  
Cc: Rodgers, William (EEO)  
Subject: VW certificate

Joel, VW is re-submitting a certificate after having to change a test number so Verify can do the Litmus test. It hasn't shown up yet so go ahead and approve if it appears friday while i'm out. You can talk to Bill if any questions about it., if it appears.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 6/25/2012 7:19:57 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test.

Please advise of the test date at your earliest convenience.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 9:33 AM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.

Regards,

Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 8:56 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Jim,

I will input the evaporative tests soon, sorry about the omission.

Regards

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 20, 2012 8:24 AM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>

Date: 06/20/2012 08:14 AM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10 ). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:46 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology . Did they change it since October?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/19/2012 04:38 PM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)

Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 6/27/2012 1:45:01 PM  
**Subject:** Beetle Test on Hold

Hi Jim,

As we discussed, we will need to reschedule the Beetle test originally set for July 11th. Please cancel this test and we will submit a new ready date in the next day or two, to re-schedule.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Sat 6/30/2012 5:49:11 PM  
**Subject:** VW Group

Hi Jim,

Today we submitted the application and certificate request for Audi test group DADXT02.04UB.

This is a carryover test group only for the Q5 with 2.0L non- FFV version. When the production change is made to the FFV version, the FFV vehicles will fall in another FFV test group. Note also that we have new EDV exhaust tests for this vehicle.

Let me know if you need anything else to proceed with the certification.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 7/2/2012 6:13:32 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

Hope you had a good weekend.

This is just a follow up on the hybrid test date we need. Please let me know the status when you can.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Monday, June 25, 2012 3:20 PM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test.

Please advise of the test date at your earliest convenience.

Thanks,

Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 9:33 AM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.

Regards,

Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 8:56 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Jim,

I will input the evaporative tests soon, sorry about the omission.

Regards

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 20, 2012 8:24 AM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/20/2012 08:14 AM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10 ). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:46 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology . Did they change it since October?

Jim Snyder  
Light-Duty Vehicle Group

Compliance Division  
United States Environmental Protection Agency  
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snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/19/2012 04:38 PM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 7/2/2012 7:30:55 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid

[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:[mailto:Snyder.Jim@epamail.epa.gov])  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Jim, I appreciated it. Now that you mention it, I was thinking of too ... but it might have to wait a bit.

Ex. 6

Just as a heads up ( I think I mentioned to you on the phone previously), we have received and are now submitting quite a few RC/FF documents. You may already see the first ones we started with the last couple days in the system.

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, July 02, 2012 3:22 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Mike, I haven't heard anything on the scheduling. There are a lot of people this week. I don't think Ben was in today but I can look into it tomorrow,

Ex. 6

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency

(734) 214-4946  
snyder.jim@epa.gov

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Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
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Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 7/3/2012 4:10:33 PM  
**Subject:** re: 2013 FE Guide Errors in Verify; Many errors when calculating adjusted combined fuel consumption(gal/100 miles); Request to update any 2013 Labels submitted before May 11, 2012  
VW Group 2013 FE Guide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx

Richard,

As we discussed over the phone yesterday---you were one of the few manufacturers who calculated fuel consumption correctly---good Job!

Dave

1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors---so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 7/5/2012 11:38:10 AM  
**Subject:** FW: VW Group - Supplemental Information (HLP-2708)

Hello Jim,

Just a follow up on the test date for the Jetta Hybrid.

I worked with the VERIFY help desk to be sure that the supplemental information is in the system. Please let me know when we get a test date.

Thanks,  
Mike

-----Original Message-----

From: [REDACTED] Ex. 6 [REDACTED]@csc.com] On Behalf Of Verify Help Desk  
Sent: Tuesday, July 03, 2012 4:31 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Supplemental Information (HLP-2708)

Hello Mr. Giles,

I've verified that your Correction is in the system. Please verify with your EPA Cert Rep if the EPA lab has received notification about this submission.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael  
(EEO)"  
<michael.giles@vw.com> To  
Verify Help Desk@CSC  
cc  
07/03/2012 03:55  
PM Subject  
RE: VW Group - Supplemental  
Information (HLP-2708)

Thanks, I have re-submitted the information.

The new transaction ID is:

Transaction Id: \_2a619ae9-752b-49ec-999b-1cd3204e1e87

Please let me know if it gets through ok.

-----Original Message-----

From: [REDACTED] **Ex. 6** [REDACTED]@csc.com] On Behalf Of Verify Help Desk

Sent: Tuesday, July 03, 2012 3:41 PM

To: Giles, Michael (EEO)

Subject: Re: VW Group - Supplemental Information (HLP-2708)

Hello Mr. Giles,

We have verified that your supplemental information submitted on June 25 is in the system and your submission should have prompted notification to the lab. Please make your supplemental information submission again as a Correction and this should send the notification to the lab.

**Ex. 6**

Verify Help Desk

Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

Verify Help Desk

Sent by: [REDACTED] **Ex. 6** [REDACTED]

**Ex. 6**

To

"Giles, Michael (EEO)"

<michael.giles@vw.com>

07/03/2012 12:09

cc

PM  
Subject  
Re: VW Group - Supplemental  
Information (HLP-2708) (Document  
link: Verify Help Desk)

Hello Mr. Giles,

Verify help desk ticket HLP-2708 was opened for your inquiry. We will look into this and get back to you shortly.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

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"Giles, Michael  
(EEO)"  
<michael.giles@vw.com> To  
Verify Help Desk@CSC  
cc  
07/03/2012 10:59  
AM Subject  
VW Group - Supplemental Information

Last week on June 25th, we submitted a supplemental information data set for the Jetta 1.4L Hybrid , which was



accepted (Transaction Identifier:

\_510f17c4-79a9-447c-8bd2-888ebb5505c5 ).

Normally we would then receive a test date from the lab. After inquiry, our certification rep at EPA has informed us that the lab did not receive notification about this submission.

Can you check this and let me know if there is something else I need to do to get a test date?

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Dorer, Frank, Dr. (EAS/3)" [frank.dorer@volkswagen.de]; Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Fri 7/6/2012 4:10:09 PM  
**Subject:** Report - MPI/FSI System  
[EPA Meeting Report May 30, 2012 - MPI FSI System.pdf](#)

Hello Jim:

Attached please find a copy of the report from our conference call concerning the MPI/FSI Injection System. I realize that you were the sole EPA participant, but you may wish to distribute the report as you see fit.

Please let me know if you have any additional questions or comments.

Best regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 7/16/2012 11:49:25 AM  
**Subject:** VW Group - Decision Information Submitted for Audi Q5 Hybrid VID DHUB-Q5H

Hello Jim,

We have submitted a Decision Information for the 2013 Audi Q5 Hybrid, VID DHUB-Q5H. This is a new test vehicle that replaces the 2012 model previously tested at EPA. No significant changes have been made to the vehicle design. Manufacturer confirmatory tests are required for FTP and HWY due to high fuel economy for the ETW.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];  
liver.schmidt@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 7/19/2012 9:36:12 PM  
**Subject:** re: 2013 FE Guide - Data in EPA's Verify data base as of 7/17/2012 attached;  
VW Group 2013 FE Guide-all-rel-dates-no-sales-7-17-2012.xlsx

Richard,

Thanks for making corrections and updating your 2013 labels over the past two weeks. Our macro didn't pick up any errors in the data currently in Verify.

Attached is a spreadsheet with all the 2013 FE Labels in Verify as of July 17, 2012.

Note that (as will be outlined in a forthcoming EPA guidance letter) the last day for manufacturers to make changes for the 2013 Printed Guide is August 29, 2012.

FYI----I'll include my previous email message to you from July 2, 2012 since it has a few more details about calculating fuel consumption value (gallons/100 miles).

As usual, thanks for your help.

Dave

**From:** David Good/AA/USEPA/US  
**To:** richard.thomas@vw.com  
**Cc:** oliver.schmidt@vw.com, Jim Snyder/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA  
**Date:** 07/03/2012 12:10 PM  
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1. Errors in Verify: Attached is a spreadsheet with the 2013 FE Label errors in Verify as of June 29, 2012. The spreadsheet contains all the 2013 FE Label data in Verify as of June 29, 2012 including some of the new Release 10 fields (columns 141-184). Color coding is explained in the heading for each column, except for the various shades of green. Labels with errors are highlighted in green fill in the first few columns or almost all columns---with the field where the error occurred highlighted in yellow fill. [Normal Green (not pea green) means the error occurred in the Combined Adjusted Fuel Consumption (gal/100 miles) field.]

When you get a chance, please correct the errors--so I can forward the corrected data to DOE for posting on the web on the 1st and 15th of each month.

2. Errors in Combined Adjusted Fuel Consumption: I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption" (column 165 of the attached spreadsheet). EPA calculated fuel consumption is in column 166. Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some manufacturers are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as prominently displayed on 2013 labels (window stickers)---as explained in more detail in Item 3, below.

When you get a chance, please correct the fuel consumption errors in Verify. [Note that I'm not currently sending fuel consumption values to DOE for posting on the web, so I don't need the fuel consumption errors corrected immediately. Please correct them as soon as possible, but if you need 2-3 weeks to correct them, that's OK with me.]

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

3. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

4. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. For this reason, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).

If possible, please try to update those labels before August 6, 2012. Please call or email me if you need more time to update your labels.

Thanks

[attachment "VW\_Group\_2013 FEGuide1-all rel dates-no-sales-06-29-2012 PLUS new Rel10 fields.xlsx" deleted by David Good/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Stephen Healy/AA/USEPA/US@EPA;"Giles, Michael (EEO)"  
[michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 7/26/2012 2:57:49 PM  
**Subject:** VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Hello Jim,

We have submitted a Certificate Request for Audi test group DADXT02.0HUB, Audi Q5 Hybrid. The Initial Application and required manufacturer confirmatory tests have been submitted to Verify. Please review and process a Certificate of Conformity by August 3rd if possible. You can contact me directly if there are any questions about these submissions.

Best regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 7/31/2012 5:50:53 PM  
**Subject:** VW Group - Simple question about Test Data (Fuel Economy)

Hello Jim and Robert,

Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)

Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?

I have a test data set for a HWY test where these values differ, and I need to know which is appropriate to use (for CAFÉ type combined FE calculation).

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 7/31/2012 6:16:06 PM  
**Subject:** VW Group - Audi Tests and Decision Information Submitted

Hi Jim,

I submitted the Audi 4.0l turbo tests we discussed along with the following Decision Information:

VID D3UF-DAQ-0, Audi A8L 5,000 ETW ;

We submitted FTP and US06 with Stop-Start active. These accompany the Stop-Start Deactivated tests already confirmed at EPA. A manufacturer retest is required for the FTP.

VID D3UF-DAQ-1, Audi A8 normal wheelbase, 4750 ETW;

We submitted FTP and US06 with Stop-Start active, plus a full array of tests with Stop-Start Deactivated. Manufacturer retests are required for both FTP's and the Hwy test.

Please review and let us know your confirmatory testing decision.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 8/2/2012 12:18:34 PM  
**Subject:** Confirmatory Tests for D3UJ-DAD/0

Hi Jim,

Thanks for the phone message regarding your decision to waive testing for VID: D3UJ-DAD/0, Test group DADXV04.03UJ.

As an experiment to solve the issue of missing confirmatory tests in Verify, I was successful in updating the Decision Information file again to now include the following EPA confirmatory tests in the set. Check your system and let me know if you now see all tests.

DADX91001362 - 90

DADX91001363 - 90

DADX91001370 - 21

DADX91001371 - 3

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 8/3/2012 5:48:05 PM  
**Subject:** FW: Certificate DADXT02.0HUB-019 with Evap Family DADXR0155B8H has been issued

Hi Jim,

If I remember correctly, usually when we get the "certificate has been issued" email message, the PDF certificate is available from VERIFY (through a link in the inbox). For the test group below, I found no corresponding email in my VERIFY account. So, I requested a report for the certificate dataset but received only xml files in the email.

Can help me to get the PDF copy of the signed certificate? I will need to send it to ARB soon so that they can complete their review.

Note - Bill submitted the request so it may be in his inbox - but he is out of the office.

Thanks,  
Mike

-----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]  
Sent: Friday, August 03, 2012 7:38 AM  
To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA)  
Subject: Certificate DADXT02.0HUB-019 with Evap Family DADXR0155B8H has been issued

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Certificate Number DADXT02.0HUB-019 with Evaporative Family DADXR0155B8H has been issued. A copy of the signed certificate is attached below. If you would like to have the certificate in an alternate 508 Compliant PDF format, please contact the Verify Help Desk.

The Verify submission this message relates to has the following values:

Test Group Name: DADXT02.0HUB

The following transaction identifier has been assigned to this request:

\_7d31a080-8976-48ee-9fb7-7300f725ce1f

Please do not reply to this message.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 8/6/2012 12:02:02 PM  
**Subject:** RE: VW Group - Certificate Request for 2013 Audi Q5 Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

The projected sales for 2013 model year Q5 hybrid are correct in the application. The market introduction for the 2012 model year Q5 hybrid was cancelled for reasons unknown to me at this time.

Also, we did finally receive the 2013 certificate in from Verify as referenced by Mike Giles last week.

Thanks,

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, August 02, 2012 6:28 PM  
To: Rodgers, William (EEO)  
Subject: Re: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Bill, Was looking at the projected sales in the Part 1. Are these numbers correct? What were the volumes from 2012MY?

2013 MY

Projected Sales by Carline, Test Weight and Transmission Configuration

**Ex. 4 - CBI**

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency

(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Stephen Healy/AA/USEPA/US@EPA, "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 07/26/2012 10:58 AM  
Subject: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Hello Jim,  
We have submitted a Certificate Request for Audi test group DADXT02.0HUB, Audi Q5 Hybrid. The Initial Application and required manufacturer confirmatory tests have been submitted to Verify. Please review and process a Certificate of Conformity by August 3rd if possible. You can contact me directly if there are any questions about these submissions.

Best regards,

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.kata@vw.com;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; liver.schmidt@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;stuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; tuart.johnson@vw.com;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]

**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]

**From:** CN=David Good/OU=AA/O=USEPA/C=US

**Sent:** Tue 8/7/2012 4:06:59 PM

**Subject:** VW/EPA mtg - Merger of VW & Porsche

**To:** "Johnson, Stuart (EEO)" [Stuart.Johnson@vw.com]  
**Cc:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/7/2012 4:13:44 PM  
**Subject:** Re: VW Porsche Aggregation Meeting - Thurs (8/9/12) at 3:30 PM

Stuart,

I included you, Len and Oliver when I scheduled the Thurs 3:30 meeting---didn't know exactly who would be coming. Please let me know if you think you'll need more than 1.5 hours.

[I invited some of our new engineers---and cc'd a few EPA folks that I don't expect will need to come.]

If possible, please send use the presentation or a one-pager ahead of time.

Also, for some reason I don't have your phone number.

See you Thursday.

Dave

From: "Johnson, Stuart (EEO)" <Stuart.Johnson@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 08/06/2012 01:08 PM  
Subject: VW Porsche Aggregation Meeting

Hello Dave,

Good to talk to you today. I wanted to confirm a meeting with EPA on Thursday August 9th @ 3:30 pm to discuss the implications of the merger of VW and Porsche. We would like to discuss all aspects of the merger as it pertains to regulatory requirements but in particular we would like to discuss the merger with regards timing of aggregating for the GHG regulation. When we review the regulation there seems to be uncertainty regarding when VW and Porsche will have to merge their fleets.

Thank you and looking forward to the discussion this Thursday.

Best Regards,

Stuart

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 8/7/2012 7:23:08 PM  
**Subject:** VW Group - Jetta Hybrid Application for Certification

Hello Jim,

We have submitted to Verify the Initial Application for Certification for the 2013 VW Jetta Hybrid. Please note that we are requesting a Conditional Certificate for this test group due to the tight schedule between market introduction and pending EPA confirmatory testing. Please review this information at your earliest convenience and contact me directly should you have any questions.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 8/10/2012 3:02:02 PM  
**Subject:** EPA Confirmatory Test CO2 Bag Data

Hello Jim,

Can you confirm if CO2 bag data will now be included in the Verify generated XML test reports for confirmatory tests conducted at EPA. It's currently required by manufacturers to input this data in Verify for Manufacturer performed tests but last EPA test reports we pulled from May did not include the CO2 bag data. We need the data to calculating 5-cycle fuel economy labels when confirmatory tests apply.

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 8/13/2012 11:30:51 AM  
**Subject:** RE: Bentley cert  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim,

Earlier in the week would be preferred. Production is scheduled for Aug. 20th and we still have to get ARB to sign off after we get a Certificate. Let me know if that's a problem.

Thanks,

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, August 10, 2012 6:15 PM  
To: Rodgers, William (EEO)  
Subject: Bentley cert

Bill, the filing fee appeared today for the Bentley but I haven't looked at it much yet. Any rush or can it wait to later next week?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/15/2012 6:15:33 PM  
**Subject:** Re: VW Group - Simple question about Test Data (Fuel Economy)

MFR\_FE is a value that a manufacturer (you) enters when entering the test data.

RoundedAdjustedFuelEconomyValue is the official fuel economy value calculated by Verify.

When a test is done by our lab, our lab's computer enters the MFR\_FE value into the test submission. However, our lab does not differentiate who or what the test is being used for. For example, they don't know if the test is being submitted for a light duty or heavy duty vehicle, or what the standard is that they are comparing each emission constituent against. It just isn't programmed into their system.

Rounding for each emission constituent is based on 1 more decimal place than the regulation specifies for that emission constituent. Because our lab doesn't know what standard it is being compared against, they don't know what to round each emission to. Their fuel economy calculations in many cases will be based on unrounded values.

The RAFF value (Rounded Adjusted) is calculated by Verify and has each emission constituent rounded to the correct precision before calculation.

So when calculating your label or CAFE values always use the RAFF values for all tests including your own tests.

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4053  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfe/>

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA  
**Date:** 07/31/2012 01:54 PM  
**Subject:** VW Group - Simple question about Test Data (Fuel Economy)

Hello Jim and Robert,

Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)

Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?

I have a test data set for a HWY test where these values differ, and I need to know which is appropriate to use (for CAFÉ type combined FE calculation).

Thanks!  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)"  
[William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com];  
Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 8/15/2012 6:49:31 PM  
**Subject:** RE: VW Group - Simple question about Test Data (Fuel Economy)  
[peavyhouse.robert@epa.gov](mailto:peavyhouse.robert@epa.gov)  
<http://www.epa.gov/nvfe/>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Bob,

Thank you for the follow up, this is helpful for our internal checks.

Regards

Mike

From: Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Wednesday, August 15, 2012 2:16 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Re: VW Group - Simple question about Test Data (Fuel Economy)

MFR\_FE is a value that a manufacturer (you) enters when entering the test data.

RoundedAdjustedFuelEconomyValue is the official fuel economy value calculated by Verify.

When a test is done by our lab, our lab's computer enters the MFR\_FE value into the test submission. However, our lab does not differentiate who or what the test is being used for. For example, they don't know if the test is being submitted for a light duty or heavy duty vehicle, or what the standard is that they are comparing each emission constituent against. It just isn't programmed into their system.

Rounding for each emission constituent is based on 1 more decimal place than the regulation specifies for that emission constituent. Because our lab doesn't know what standard it is being compared against, they don't know what to round each emission to. Their fuel economy calculations in many cases will be based on unrounded values.

The RAFE value (Rounded Adjusted) is calculated by Verify and has each emission constituent rounded to the correct precision before calculation.  
So when calculating your label or CAFE values always use the RAFE values for all tests including your own tests.

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4053  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 07/31/2012 01:54 PM  
Subject: VW Group - Simple question about Test Data (Fuel Economy)

Hello Jim and Robert,

Could you help clarify a question I have about the data elements related to FE in the test data xml reports from VERIFY (?)

Could you explain the difference between "MFR FE" and "RoundedAdjustedFuelEconomyValue" tags found within the "EPAGeneratedEmissionTestDetails" section of the xml?

I have a test data set for a HWY test where these values differ, and I need to know which is appropriate to use (for CAFÉ type combined FE calculation).

Thanks!  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/17/2012 7:06:21 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Aug 15, 2012; last day to make corrections for the Printed Guide is Aug 29, 2012  
[VW Group 2013 FE Guide-all rel dates-no-sales-8-15-2012.xlsx](#)

Richard

I'll send you the data in Verify as of Aug 15---even though I sent you an updated dataset yesterday. The Aug 15 dataset was double checked more thoroughly, includes the possible error regarding Stop-Start vehicles, etc. Thanks for your help correcting errors over the past month or so.

Attached are the data in Verify as of Aug 15, 2012. Please make any needed corrections (including corrections to the Verify Release 10 fields) as soon as possible. The last day to make corrections for the Printed Guide is August 29, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Aug 16, 2012 for posting on the web. In the future, labels with pea green or dark green fill in the first few columns will not be sent to DOE for posting on the web. (Pea green fill means the error occurred in one of the Verify Release 9 fields. Dark green fill means an error occurred in one of the new Verify Release 10 fields.)

As you begin to correct the errors, please let me know if you need an up-to-date query of the data in Verify--e.g. next week or so and I'll be glad to email it to you.

Placeholder vehicles for the 2013 Printed Guide: As a reminder, please email me an excel spreadsheet with any 2013 alternative fuel/new technology placeholder vehicles (2013 vehicles for which the fuel economy will not be available by August 29, 2012)---including diesel vehicles, CNG vehicles, Electric vehicles, conventional hybrid vehicles, plug-in hybrid vehicles, FFVs and fuel cell vehicles. For more information about sending us your placeholder vehicles, please see Enclosure 2, Section 3 of the recent EPA guidance letter which was sent out on Monday (CD-12-10 Subject: Fuel Economy Label Information for 2013 Model Year). I need a spreadsheet with your placeholder vehicles by August 29, 2012.

I'll include my (edited) notes from previous emails for your convenience.

As usual, thanks for your help.

Dave

Edited notes from my previous email messages:

1. Correcting Errors: As usual, the errors and my comments are shown in the first two columns of the spreadsheet. Green fill in the first few columns means our macro detected an error. Labels with errors will not be included in the 2013 Printed Guide until the errors are corrected.

2. Voluntarily lowered Fuel Economy: For labels which you voluntarily lowered the mpg of your vehicles, EPA regulations require that you also increase the CO2 accordingly. Calculating the voluntarily increased combined CO2 value is fairly easy (knowing the unrounded adjusted mpg value, the rounded, voluntarily lowered mpg value, and the unrounded adjusted CO2 value). Our macro will check the voluntarily

increased city, highway and combined CO2 value for errors using the formula in the following example:

Given:

unrounded adjusted combined mpg = 21.6949 mpg

unrounded adjusted combined CO2 = 408.4 gpm

Voluntarily lowered Label mpg = 20 mpg

Then: Voluntarily increased CO2 = (21.6949 mpg x 408.4 gpm) / 20 mpg = 443.01 gpm; which rounds to 443 gpm CO2

3. Errors in Combined Adjusted Fuel Consumption: As indicated in a previous email to most manufacturers, I'm finding a lot of errors in the new field "Adjusted Combined Model Type Fuel Consumption." Some manufacturers are entering fuel economy values (mpg) values instead of fuel consumption (gallons per 100 miles). Some are incorrectly calculating fuel consumption using the (incorrect) unrounded adjusted combined mpg value instead of the correct rounded adjusted combined mpg value (as listed prominently on the 2013 labels (window stickers)---as explained in more detail in Item 4, below.

If there are errors in the fuel consumption value listed on the actual labels (window stickers) of your vehicles, please correct the labels as soon as practicable. Call or email me if you have questions about the fuel consumption values shown on the actual labels (window stickers) of your vehicles.

4. Mistake in the EPA Regulations for Calculating Fuel Consumption (600.311-12(c): For conventional vehicles (not EVs or PHEVs), there is a mistake in the current regulations at 600.311-12(c) which EPA proposed to correct in the 2017 greenhouse gas proposal (page 76FR 75392, Dec 1, 2011).

The current (incorrect) regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The unrounded value for combined fuel economy from 600.210-12(c)."

The (correct) proposed regulations read as follows: "Fuel Consumption Rate = (100/adjusted combined MPG), where "MPG = The value for combined fuel economy from 600.210-12(c) rounded to the nearest whole mpg." Please use the voluntarily lowered combined adjusted MPG value, if applicable.

We are making this change for several reasons, e.g. so that customers will be able to accurately calculate the fuel consumption of their vehicle from the information displayed on the label; so that two vehicles with the same combined fuel economy mpg values won't have different fuel consumption values displayed on the label, etc. One benefit to manufacturers and EPA is that this correction will result in fewer questions from consumers about how the fuel consumption values are calculated.

5. Request to update any 2013 FE Labels submitted to Verify before May 11, 2012: EPA and DOE are in the process of updating the information displayed at [www.fueleconomy.gov](http://www.fueleconomy.gov) to show the same type of information which is displayed on the 2013 window stickers, e.g. Fuel Economy (1-10) rating, Greenhouse Gas (1-10) Rating, Smog (1-10) rating, adjusted combined fuel consumption (values, adjusted combined CO2 (grams/mile) values, amount saved (or spent) over 5 years, battery charging time for EVs & PHEVs, etc. We anticipate that the website will be updated within the next couple of months. In addition, the Greenhouse Gas 1-10 score will be shown in the 2013 Printed Guide. For these reasons, we are requesting that manufacturers update any labels which were entered into EPA's Verify data base prior to May 11, 2012 (Verify Release 9 labels which don't contain this information).



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 8/17/2012 8:40:57 PM  
**Subject:** VW Group - MY2013 Bentley Decision Information

Hello Jim

Today I submitted decision information for Flex-fuel MY 2013 Bentley Continental GTC and GT with 6.0L turbo engine, for test group DBEXV06.04UC. A total of 4 configurations were submitted (2 weight classes x 2 for FFV tests = 4 configs). New exhaust tests for both EDV and FEDV with both gasoline and ethanol fuels are submitted.

Please note this is a carryover from the MY 11 BBEXv06.0501 test group, but with updated engine controller and an 8 speed transmission.

Please advise of your decision as soon as you have a chance, as this will help us with scheduling. Also as always please call me if you have any questions about this.

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 8/20/2012 4:04:58 PM  
**Subject:** VW Group - Confirmatory Test Decision Information for Audi 2.0TFSI FFV

Hello Jim,

I have submitted all tests and Decision Information files for the follow (new) 2013 Audi FFV test group DADXJ02.0FUB. The Audi Q5 SUV will be added to the test group later, hence the "J" test group name. Only E85 exhaust tests and E10 EVAP tests have been submitted because we are using carry-across gasoline tests from the existing gasoline-only test group DADXV02.03UB. The related VID's are as follows:

DFUB-BAA, Configuration 1 – EDV - Audi A4 Allroad quattro

DFUD-BAQ, Configuration 2 – FEDV - Audi A4 quattro / A5 quattro

DFUB-BAQ, Configuration 3 – FEDV / EVAP - Audi A5 Cabrio quattro

We are under a time crunch to certify and produce fuel economy labels for these, so your earliest attention would be greatly appreciated.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 8/21/2012 3:29:45 PM  
**Subject:** FW: Confirmatory Test Waived (BY77623/13 / 1)

Hello Jim,

We waivers for 3 of the 4 configurations here (thank you)! Can you confirm status for configuration #3?

Thanks,  
Mike

-----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]  
Sent: Tuesday, August 21, 2012 11:12 AM  
To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA); Thomas, Richard (EEO); VWoA EEO Government  
Subject: Confirmatory Test Waived (BY77623/13 / 1)

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Confirmatory Test for the following Vehicle has been Waived:

Manufacturer: BEX  
Vehicle ID: BY77623/13  
Vehicle Configuration: 1

The Verify submission this message relates to has the following values:

Vehicle ID: BY77623/13

Vehicle Configuration #: 1

Test Group Name: DBEXV06.04UC

The following transaction identifier has been assigned to this request:

\_4f93cd18-f551-4a99-8e45-ed343d011a56

Please do not reply to this message.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 8/22/2012 7:43:47 PM  
**Subject:** VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,

I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB

Evap. Family: DADXR0140B8F

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** michael.giles@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/22/2012 7:53:52 PM  
**Subject:** Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr.	Vehicle ID	Test Date	Manuf. Test Number
Audi	VW465 790007/09	12/09/11	CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\*

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/23/2012 1:09:20 PM  
**Subject:** RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 8/23/2012 1:50:01 PM  
**Subject:** RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hi Jim,

I should clarify that I have described Audi Q5 in this Application but have not yet submitted E85 test data for the model. We anticipate data in the coming weeks, at which time you had mentioned possibly selecting it for EVAP confirmatory testing to coincide with the already selected A5 Cabrio EVAP confirmatory tests from this test group.

Considering that the certificate would be conditional with or without Q5 included, I propose the Certificate be issued as requested (with Q5) to allow vehicles to be Labeled and shipped immediately IF we receive a test waiver from you for the E85 exhaust tests.

Sorry for the confusion.

Bill

From: Rodgers, William (EEO)  
Sent: Wednesday, August 22, 2012 3:44 PM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Thomas, Richard (EEO); Kata, Leonard (EEO)  
Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,

I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB

Evap. Family: DADXR0140B8F

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 8/27/2012 12:54:14 PM  
**Subject:** RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)

Thanks Jim.

I will be resubmitting the CSI and Cert Request without Q5 included this morning.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, August 24, 2012 11:00 AM  
To: Rodgers, William (EEO)  
Cc: Giles, Michael (EEO)  
Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Bill, I talked to Mike about this but here's the story. Even though it is a Conditional Cert, I don't think I can include the Q5 on the certificate until you have at least submitted data on the Q5 since it will be the new EDV. The Conditional provision is only intended for vehicles pending a confirmatory test. I will deny the cert request and you can re-submit it without the Q5.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
Date: 08/23/2012 09:50 AM  
Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hi Jim,  
I should clarify that I have described Audi Q5 in this Application but have not yet submitted E85 test data

for the model. We anticipate data in the coming weeks, at which time you had mentioned possibly selecting it for EVAP confirmatory testing to coincide with the already selected A5 Cabrio EVAP confirmatory tests from this test group.

Considering that the certificate would be conditional with or without Q5 included, I propose the Certificate be issued as requested (with Q5) to allow vehicles to be Labeled and shipped immediately IF we receive a test waiver from you for the E85 exhaust tests.

Sorry for the confusion.  
Bill

From: Rodgers, William (EEO)  
Sent: Wednesday, August 22, 2012 3:44 PM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Thomas, Richard (EEO); Kata, Leonard (EEO)  
Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,  
I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB  
Evap. Family: DADXR0140B8F

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 8/27/2012 1:33:33 PM  
**Subject:** FW: EPA Has Denied The Certificate Request for TG: DADXJ02.0FUB Evap: DADXR0140B8F

Hi Jim,

I have resubmitted the below mentioned CSI and Cert Request, excluding the Audi Q5. We are under a tight deadline on this one so if there are any questions please let me know as soon as possible. I will revise the application later in the week when the Q5 is added back in with a running change.

Thanks,  
Bill

-----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]  
Sent: Friday, August 24, 2012 11:07 AM  
To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA)  
Subject: EPA Has Denied The Certificate Request for TG: DADXJ02.0FUB Evap: DADXR0140B8F

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

The certificate request for Test Group DADXJ02.0FUB and Evaporative Family DADXR0140B8F has been denied. Contact your CSD compliance representative for additional information.

The Verify submission this message relates to has the following values:

Test Group Name: DADXJ02.0FUB

The following transaction identifier has been assigned to this request:

\_dc4ad1fd-55b8-4f72-a268-45e0914dc52c

Please do not reply to this message.

**To:** DavidA Wright/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 9/5/2012 12:36:44 PM  
**Subject:** RE: Request for US06 Drive Trace  
[Copy of US06\\_Trace.xlsx](#)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[image001.gif](#)

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,

Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ

Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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**To:** Willem VandenBroek/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im  
Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers,  
William (EEO)" [William.Rodgers@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 9/5/2012 12:40:07 PM  
**Subject:** RE: 2013 Bentley Fee Filing Form  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)  
[image001.gif](#)

Hi Bill;

Thank you for the information, you are correct. We only filed one fee filing form for test group DADXT03.03UG with that April 27th, 2012 electronic payment. The other two fees are for test groups which they are deciding whether they will be model year 2013 or 2014, due to SOP delays. We are waiting for a final decision and applications, and to see if they will be processed this calendar year (2012).

Thanks,

Richard

From: Willem VandenBroek [mailto:VandenBroek.Willem@epamail.epa.gov]  
Sent: Friday, August 10, 2012 8:33 AM  
To: Thomas, Richard (EEO)  
Subject: Re: 2013 Bentley Fee Filing Form

Richard,

Looking over our books, I see we had a \$98,034 ACH payment on 4/27, out of which we paid for DADXT03.03UG, leaving \$65,356 unclaimed. FYI.,

Bill

"Thomas, Richard (EEO)" ---08/09/2012 02:48:40 PM---Please find attached the fee filing form for 2013 Bentley Mulsanne test group DBEXV06.84LA. Electr

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Fees@EPA  
Cc: Willem VandenBroek/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 08/09/2012 02:48 PM  
Subject: 2013 Bentley Fee Filing Form

Please find attached the fee filing form for 2013 Bentley Mulsanne test group DBEXV06.84LA. Electronic payment will be made on August 9th, 2012.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

[attachment "2013 EPA Cert Fees DBEXV06.84LA to EPA.pdf" deleted by Willem VandenBroek/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 9/5/2012 2:47:31 PM  
**Subject:** VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 9/5/2012 7:37:09 PM  
**Subject:** VW Group - Confirmatory test decision information for VID D3UF-Q5A

Hello Jim,

I have submitted decision information for the 3.0L Q5, which is a part of a running change for Audi test group DADXJ03.03UF.

Vehicle ID: D3UF-Q5A

New evaporative family: DADXR0140B8B

Configuration 0: FEDV with start stop active / also used for evaporative tests

Configuration 1: FEDV with start-stop Inactive

A running change letter will be submitted today. Manufacturer confirmatory tests are required for High FE for ETW for both configurations.

Please let us know EPA confirmatory decision as soon as possible.

Thanks,

Mike

From: Rodgers, William (EEO)  
Sent: Wednesday, September 05, 2012 10:48 AM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael (EEO)  
Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 9/11/2012 1:23:42 PM  
**Subject:** VW Group - EVAP Test Schedule

Hello Jim,

We would like to request that the Audi A5 Cabriolet, VID: DFUB-BAQ, selected for Evap testing be scheduled for delivery to EPA on October 29 with testing on October 31.

I am also getting ready to submit new test data for an Audi A8 with 3.0l TDI diesel and stop-start. This will be requested for the week prior (Oct 22nd.) if selected for testing.

Let me know if this A5 schedule works for you.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Tue 9/11/2012 1:54:29 PM  
**Subject:** Volkswagen Meeting with EPA - Proposal

Hello Jim:

As you know, we have some vehicles at EPA next week for confirmatory testing. There are some colleagues from VWAG Germany that will accompany the test vehicles. This includes Mr. Juergen Peter and Ms. Hannah Schlueter. I have been asked if it would be possible to have a brief, perhaps one hour, meeting with you and other EPA staff, while Mr. Peter and Ms. Schlueter are in Ann Arbor. The topic would concentrate on emission testing, including evaporative emission testing for future advanced technology vehicles.

My proposal would be September 20 or 21, 2012, late morning or early afternoon. Please let me know if you agree to meet with us and what time may be most convenient for you.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Tue 9/11/2012 8:26:28 PM  
**Subject:** Audi Meeting with EPA - Proposal

Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

We propose a meeting at one of the following times:

- Monday, October 29 2012; afternoon
- Tuesday, October 30, 2012; morning

We would appreciate a three-hour time slot. Proposed discussion topics include:

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.



Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/12/2012 12:33:52 PM  
**Subject:** RE: Request for US06 Drive Trace  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
(embedded image)

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*  
This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.  
\*\*\*\*\*

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/05/2012 08:36 AM  
Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

\*\*\*\*\*

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace  
Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

\*\*\*\*\* [attachment

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 9/12/2012 1:37:52 PM  
**Subject:** RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Thanks Jim, I will resubmit the Q5 Certificate request as conditional. I hadn't thought about that already being conditional.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, September 11, 2012 7:45 PM  
To: Rodgers, William (EEO)  
Subject: Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a conditional certificate I think it has to be a conditional too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
Date: 09/05/2012 10:47 AM  
Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,  
Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another

test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Verify Help Desk [verifyhelp@csc.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 9/12/2012 3:03:09 PM  
**Subject:** RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Jim,

I did receive your Cert request denial but have not been able to access the Verify Certification Request screen to process the revised conditional request. I'll try again later I guess?

PS – I was able to processed a Decision Information correction for the pending A5 Cabriolet Evap test (VID DFUB-BAQ) to change the delivery date to Oct 29th, and also processed the related Supplemental Information with seemingly no Verify problems.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, September 11, 2012 7:45 PM  
To: Rodgers, William (EEO)  
Subject: Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a condtional certificate I think it has to be a conditional too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 09/05/2012 10:47 AM  
Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

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Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219



**To:** Jim.Snyder/AA/USEPA/US@EPA[]  
**From:** [REDACTED] **Ex. 7**  
**Sent:** Wed 9/12/2012 3:42:29 PM  
**Subject:** Accepted: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Sigelko, Jenny (EEO)"  
**Sent:** Wed 9/12/2012 4:44:11 PM  
**Subject:** Accepted: FW: Invitation: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles (Sep 20 01:00 PM EDT in AA-N62-ASD&CD/AA-OTAQ-OFFICE@EPA)  
[winmail.dat](#)  
[message\\_body.rtf](#)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 9/12/2012 5:05:09 PM  
**Subject:** RE: Audi Meeting with EPA - Proposal

Hello Jim:

I will let my Audi colleagues know about the time limit. Otherwise I will wait to hear which date works best for you.

Thanks,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, September 12, 2012 11:38 AM  
To: Kata, Leonard (EEO)  
Subject: Re: Audi Meeting with EPA - Proposal

Hi Len , I got your note yesterday. I'm just thinking about who to invite since you mentioned Tier 3. We usually try to limit mtgs to 2 hours. I rather push them into condensing their discussion down to that.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>  
Date: 09/11/2012 04:27 PM  
Subject: Audi Meeting with EPA - Proposal

Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

We propose a meeting at one of the following times:

- Monday, October 29 2012; afternoon
- Tuesday, October 30, 2012; morning

We would appreciate a three-hour time slot. Proposed discussion topics include:

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 6  
**Sent:** Wed 9/12/2012 5:13:21 PM  
**Subject:** RE: VW Group - Confirmatory test decision information for VID DFUB-Q5A (HLP-2914)

Hello Mr. Rodgers,

Verify help desk ticket HLP-2914 has been opened for your inquiry. CDX is still experiencing issues that are impacting submission made in Verify. I will provide an update as soon as I have a status.

Ex. 6

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Rodgers, William  
(EEO)"  
<William.Rodgers@vw.com> To  
Jim Snyder  
<Snyder.Jim@epamail.epa.gov>  
09/12/2012 11:03 cc  
AM Verify Help Desk@CSC, "Giles,  
Michael (EEO)"  
<michael.giles@vw.com>  
Subject  
RE: VW Group - Confirmatory test  
decision information for VID  
DFUB-Q5A

Jim,

I did receive your Cert request denial but have not been able to access the Verify Certification Request screen to process the revised conditional request. I'll try again later I guess?

PS – I was able to processed a Decision Information correction for the pending A5 Cabriolet Evap test (VID DFUB-BAQ) to change the delivery date to Oct 29th, and also processed the related Supplemental Information with seemingly no Verify problems.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, September 11, 2012 7:45 PM  
To: Rodgers, William (EEO)  
Subject: Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a condntional certificate I think it has to be a conditional too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 09/05/2012 10:47 AM  
Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,

Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had

expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Schlueter, Hannah (EASZ/1)"  
**Sent:** Wed 9/12/2012 8:48:05 PM  
**Subject:** Zugesagt: FW: Invitation: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles (Sep 20 01:00 PM EDT in AA-N62-ASD&CD/AA-OTAQ-OFFICE@EPA)  
[winmail.dat](#)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 9/13/2012 11:02:03 AM  
**Subject:** VW Group - A5 Cabriolet Evap Test Schedule

Jim,

It appears, after fighting Verify all day yesterday, that I was successful in getting the Supplemental Information processed and corrected the delivery date in the Decision Information for the Audi Cabriolet Evap. test to be scheduled on Oct 31st, VID: DFUB-BAQ.

Please confirm that you have all that is necessary to schedule the test.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Verify Help Desk [verifyhelp@csc.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 9/13/2012 11:33:09 AM  
**Subject:** Verify test processing error  
[here](#)

I am unable to process the following test data batch file in Verify since Monday. I can open it in Verify and view the first test just fine, but the error appears once I try to submit the batch. The necessary Vehicle Information for VID: DUG-DAQ configuration 0 and 1 and Fuel Properties was submitted successfully.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

There was an unexpected error processing your submission. Please retry your submission at a later date. If you continue to receive this message please contact the Verify Helpdesk. It can be reached through email (verifyhelp@csc.com) or by phone (1-888-890-1995 and choose option 4 ).

The rejection occurred at Thu Sep 13 07:23:43 EDT 2012 while processing document: \_f8f1e029-0479-4de2-b079-b2f8a8fe322e

Transaction Identifier: \_f8f1e029-0479-4de2-b079-b2f8a8fe322e

Click [here](#) to view the status history.

Thank you for submitting your request to Verify via CDX.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 9/13/2012 12:29:26 PM  
**Subject:** VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from currently certified test group DBEXV06.0501, which has the same evaporative family.

The changes for this new test group consist of an 8 speed transmission and a new engine controller.

Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciate your quick response.

Regards

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 9/13/2012 1:15:00 PM  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, September 13, 2012 8:43 AM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
Date: 09/13/2012 08:29 AM  
Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from currently certified test group DBEXV06.0501, which has the same evaporative family.

The changes for this new test group consist of an 8 speed transmission and a new engine controller.

Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciate your quick response.

Regards  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 9/13/2012 2:36:31 PM  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

I now have a report that the certificate request was accepted.

From: Giles, Michael (EEO)  
Sent: Thursday, September 13, 2012 9:15 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

From: Jim Snyder [<mailto:Snyder.Jim@epamail.epa.gov>]  
Sent: Thursday, September 13, 2012 8:43 AM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>



Date: 09/13/2012 08:29 AM  
Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from currently certified test group DBEXV06.0501, which has the same evaporative family.

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Mike  
Michael Giles  
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Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 9/14/2012 11:39:42 AM  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:[mailto:Snyder.Jim@epamail.epa.gov])  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Jim,

I have a note that fee payment was made electronically today. Please let us know if you have confirmation to proceed.

Thanks,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, September 13, 2012 7:16 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

The cert request is in verify. I glanced at it and found that the fee payment hasn't shown up yet. Shows VW sent it 8/31.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/13/2012 10:36 AM  
Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

I now have a report that the certificate request was accepted.

From: Giles, Michael (EEO)  
Sent: Thursday, September 13, 2012 9:15 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Bentley Application Submitted DBEXV06.04UC

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From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, September 13, 2012 8:43 AM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/13/2012 08:29 AM  
Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

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I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from urrently certified test group DBEXV06.0501, which has the same evaporative family.

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this so as always we would appreciated your quick response.

Regards  
Mike  
Michael Giles  
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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 9/14/2012 2:42:05 PM  
**Subject:** FW: Confirmation of Certification Fees Payment Bentley

For your information.

-----Original Message-----

From: fees@epa.gov [mailto:fees@epa.gov]  
Sent: Friday, September 14, 2012 10:22 AM  
To: Thomas, Richard (EEO)  
Subject: Confirmation of Certification Fees Payment

To the representative for Bentley Motors Ltd.:

Your certification Fee Filing Form(s) submitted for the following family or test group(s) and the associated financial documentation for your payment of \$32678.00 were received on 09/14/2012.

- DBEXV06.04UC

This message indicates only that EPA has received record of your payment and form(s) for the above certification fee. It does not constitute the granting of a Certificate of Conformity by EPA or convey any information about the status of your certification application for the subject family or test group(s).

Please do not respond to this email. If you have any questions regarding certification of the family or test group(s), please contact your EPA Certification Representative; for questions on fees, contact Fees@epa.gov.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 9/14/2012 6:02:28 PM  
**Subject:** VW Group - Decision Information Audi A8/A8L TDI Stop-Start

Hi Jim,

Just a heads up, I was finally able to submit the tests and Decision Information related to the Audi A8/A8L TDI with Stop-Start we discussed.

Let me know if you are still interested in testing this vehicle.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** richard.thomas@vw.com[]  
**Cc:** leonard.kata@vw.com;oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; liver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 9/14/2012 9:21:01 PM  
**Subject:** re: Question about your 2011 CAFE report

Richard,

We are beginning our review of your 2011 CAFE report and data submittal. The EPA folks who publish the EPA CO2 & Fuel Economy Trends report have asked me why the following vehicles are included in your 2011 Truck CAFE Report (in Verify):

Tiguan (2WD)

As you know, beginning with 2011 CAFE reports, NHTSA regulations & policy requires 2WD SUVs equal to or less than 6000 lbs GVWR will be included in your passenger car CAFE, ref 74 FR 14419, March 30, 2009.

Please let us know as soon as you get a chance. We could use a quick response, if possible, as the 2012 FE Trends report is fast approaching their printing deadline.

Thanks

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)"  
[William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 9/17/2012 4:09:58 PM  
**Subject:** VW testing schedule

Hello Vincent,

To follow up from my voice message – would you be able to send a schedule for the testing for our Jetta Hybrid and Beetle TDI? We would like to have 2 or 3 staff there for the start of testing if possible.

Also, we have a new colleague here from Germany, and we would like to request a small tour of your facility (maybe after one of the tests if this works for you).

Please let me know or feel free to call me if you wish to discuss.

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Mon 9/17/2012 4:19:11 PM  
**Subject:** Declined: RE: Audi Meeting with EPA

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 9/18/2012 6:26:12 PM  
**Subject:** VW Group - Running Change to add Q5 carline for MY13 Audi Test Group DADXVJ03.03UF

Hello Jim,

We submitted a revised application as well as running change letter for the addition of the Q5 carline to Audi Test group DADXJ03.03UF, with new evaporative family DADXR0140B8B. This new evaporative family is similar to previously certified evap. family DADXR0140B8A, but now includes a 5 gram bleed canister. New evaporative tests (EDV) were performed for the Q5 however the supporting exhaust tests were for fuel economy only (FEDV).

We have also submitted a certificate request for this Q5 addition.

Please let us know if you have any questions during your review.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];  
liver.schmidt@vw.com[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/16/2012 8:38:05 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Oct 15, 2012 which held up  
posting on www.fueleconomy.gov  
[VW Group 2013 FE Guide1-all-rel dates-no-sales 10-15-2012.xlsx](#)

Richard,

Attached are the data in Verify as of Oct 15, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 16, 2012 for posting on the web. The next normal posting will be November 1, 2012.

Please make any needed corrections as soon as possible.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 10/17/2012 4:19:41 PM  
**Subject:** Fw: 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide?  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[Oliver.Schmidt@vw.com](mailto:Oliver.Schmidt@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

FYI

----- Forwarded by David Good/AA/USEPA/US on 10/17/2012 12:19 PM -----

**From:** "Bain, Debbie T." <baindt@ornl.gov>  
**To:** David Good/AA/USEPA/US@EPA  
**Cc:** "Hopson, Janet L." <hopsonjl@ornl.gov>  
**Date:** 10/17/2012 12:16 PM  
**Subject:** RE: 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide?

Yes, it has been removed.

Debbie

**From:** Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
**Sent:** Wednesday, October 17, 2012 11:20 AM  
**To:** Bain, Debbie T.  
**Cc:** Hopson, Janet L.  
**Subject:** 2013 Printed FE Guide - Did you remove the VW Jetta Hybrid from the Printed Guide?

Debbie,

VW wants to make sure that the 2013 Jetta Hybrid was removed from the Printed Guide. Ex. 4 - CBI  
Ex. 4 - CBI

Thanks

----- Forwarded by David Good/AA/USEPA/US on 10/17/2012 11:16 AM -----

**From:** "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
**To:** David Good/AA/USEPA/US@EPA  
**Cc:** "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
**Date:** 10/17/2012 09:23 AM  
**Subject:** Published Guide Information

Hi Dave;

Would you be so kind, to confirm that the 2013 fuel economy label, index 100, for the Volkswagen Jetta Hybrid is not included in the published fuel economy guide to be printed sometime in November.

As you also confirmed with our phone conversation, I understand that due to the November release date in Verify, this label index 100 will also not appear on the web fuel economy site either.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

[attachment "winmail.dat" deleted by David Good/AA/USEPA/US]

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 11/21/2012 10:09:16 PM  
**Subject:** re: 2011 CAFE Report

Richard,

re: 2011 CAFE Report

I couldn't find your 2011 CAFE model year report(s) in the Document Module of Verify. I looked in Verify for 2011 model year documents in the Compliance Document Type of "CAFE Model Year Report" and couldn't find any 2011 CAFE reports (the CAFE letter(s) to EPA).

When you get a chance, please email me a pdf copy of your 2011 CAFE report(s) for all applicable categories (Import pass car, Domestic pass car and Light Truck) and enter a copy in the Verify Document module.

Thanks

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/7/2013 2:31:07 PM  
**Subject:** RE: Telephone Message regarding EPA's Verify database requirements for CARB LEV3 diesel fuel

Len,

Thanks for your email and Happy New Year to you also.

The part of the message that was cut off, I asked two questions, e.g.:

My understanding is that CARB LEV 3 regulations revised the diesel fuel specs for 2015 and subsequent model years---which would require a new fuel code in Verify for CARB LEV3 diesel fuel.

My questions are 1) whether you agree with my reading of CARB LEV3 diesel fuel requirements, and 2) what test fuel VW intends to use for 2014 and later diesel vehicles. [Normally, CARB LEV3 requirements start in 2015 model year, but optionally manufacturers may meet LEV3 requirements in 2014 model year.]

Dave

**From:** "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
**To:** David Good/AA/USEPA/US@EPA  
**Date:** 01/07/2013 08:31 AM  
**Subject:** RE: Telephone Message

Hello Dave:

I heard part of your telephone message regarding diesel fuel, but the system cut it short due to length. My understanding is that you believe that the diesel fuel spec in the ARB LEV III regulations does not comply with the EPA diesel fuel spec. I assume you mean test fuel. You asked if we agree that this is the case, and then the message was cut off. I guess that the rest of the question might be what the implications are for Tier 3 or if we would have some suggestions on how to address this situation. I will discuss this internally and we will respond to the initial question. Please let me know what additional information you may want. A short e-mail would be good, since our telephone message system appears to have some limitations.

Best regards and Happy New Year!

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.



Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/22/2013 5:21:39 PM  
**Subject:** re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2014 FE Guide-all rel dates-no-sales-1-17-2013.xlsx](#)

Richard,

Our macro picked up a few errors in your 2014 labels. Attached are the data in Verify as of January 17, 2013 for 2014 model year FE labels. Labels with pea green fill in the first few columns contained errors and were not sent to DOE for posting on the web (provided the label release date was Jan 22, 2013 or earlier).

I'll run my next query of the 2014 FE Label data on Feb 1, 2013---for posting on the web a few days later.

Please make any needed corrections when you get a chance.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/29/2013 10:13:41 PM  
**Subject:** re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible  
[VW Group 2013 FEGuide new labels-all rel dates-no-sales-1-25-2013.xlsx](#)  
[VW Group 2014 FEGuide-all rel dates-no-sales-1-25-2013.xlsx](#)

Richard,

re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Our macro picked up some errors in your 2013 Labels. If possible please correct them before 2/1/2013---so I can send the data to DOE for posting on the web (for the Feb 1st posting).

Sorry about the late notice. I'll also include the 2014 Labels FYI--they looked OK to me.

Thanks

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 2/8/2013 5:06:44 PM  
**Subject:** Re: VW/EPA Certification Meeting October 29, 2012  
[00 Agenda EPA Cert-Test.pptx](#)  
[01 Start Stop Survey.pptx](#)  
[02 FFV.pptx](#)  
[03 AWC.pptx](#)  
[04 BEV EPA.pptx](#)  
[05 BEVx 2012 EPA.ppt](#)  
[06 SAE 1634 EPA.pptx](#)  
[07 PHEV.pptx](#)  
[08 Energy assist EPA.pptx](#)  
[VW EPA Cert Meeting Oct 29,2012.pdf](#)  
[2014 generic EV Label calculations-1-18-13.xlsm](#)

Len,

Thanks for checking with us (and the reminder). Here are my comments:

1. Item 2 (FFV usage factor) - My notes from that meeting indicate that EPA had quite a few concerns about Item 2---the proposed method of performing a survey of your 2016 and later model year FFVs to determine the in-use ethanol (E85) usage factor, ref. 40 CFR 600.510-12(k). We were concerned about the counting method for your algorithm. It seemed to count any fuel which the ethanol sensor determines is above E20 as if the vehicle were refueled for that refueling event or tankful or those miles(?) as if the vehicle were refueled with E85 (in the spring, summer & fall) or E70-85 (in the winter).

Your minutes seem OK. Your minutes read as follows: "EPA reaction to the VW proposal: 1. May need a more sophisticated algorithm (to account for residual fuel). 2. Need a nationwide rather than regional calculation. VW will present an updated proposal for determination of the usage factor for the next meeting. EPA wants to see more refinement regarding the ethanol content/sensor (Slide 4)."

Please include Rob French and me (for GHG purposes) when you present your updated proposal. Note that EPA intends to provide in the next month or so the 2016 ethanol (E85) usage factor discussed in 40 CFR 600.510-12(k)(1). I think it will be via a Federal Register notice.

2. Item 3 (2017 Audi Q7 PHEV with optional wireless charging system) - I'd like to send a description of this system to NHTSA as soon as possible for their advice on how to classify the vehicle (car or truck) for CAFE purposes. Hopefully EPA and NHTSA will agree on how to classify the vehicle for CAFE and GHG purposes.

Please send us a detailed description of how the ride height of the vehicle is controlled, e.g. how the customer can control ride height, how the vehicle computer controls ride height (including parameters sensed and parameters controlled). In addition, please describe how the optional wireless charging system influences the ride height & ride height controls. For example, please provide a description of the system similar to what will eventually go in the owners manual (plus any other instructions you intend to provide to the customer).

Also, please send us the five measurements for all the various possible ride height positions---including

various driver-controlled ride height positions and and ride height positions which are automatically controlled (similar to your first slide and similar to the information you provided for your 2001 Audi A6 Quattro). Please provide the ride height for vehicles with and without the optional wireless charging system. [Measurements include approach angle, breakover angle, departure angle, running clearance (in inches and cm), axle clearance(in inches and cm).]

3. Item 9 Audi Energy Assist and GHG Off-Cycle Credits - We had quite a few questions about this system, and couldn't see how to objectively determine the credits. So far, we haven't discussed this item within our GHG team members. To get the issue moving, I'd recommend that you send us a letter outlining the details of how the system works, how you would propose to quantify any potential credits, where in the 2017 GHG rule this system is discussed (if it is), plus any other relevant information.

4, BEV PHEV calculators - I emailed you the attached BEV calculator a couple weeks ago (the attached spreadsheet is renamed it to 2014). Was this what you were looking for? For the PHEV calculator, I have one for a non-blended PHEV. Do you want a calculator for a non-blended or blended PHEV?

I'll defer to Jim and Chris on the other items in your minutes, plus any additional comments they may have on these two items.

Dave

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Date: 02/06/2013 12:00 AM  
Subject: VW/EPA Certification Meeting October 29, 2012

Hello Jim, Dave, and Chris:

I know that some time has passed since we met in October 2012, but I would appreciate it if you would take a look at the meeting report and provide any comments or feedback. Other EPA staff participated as well and may wish to contribute their comments.

I have attached all of the slides from our meeting, for ready reference. The report is the last attachment. Please let me know if this should go into VERIFY.

Since the report indicates some follow-up on the part of VW and EPA, we would appreciate an opportunity to have a telephone conference/webinar to discuss the open points.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 2/8/2013 10:00:15 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2013 FE Guide-new labels since 1-3-2013-all rel dates-no-sales-2-5-2013.xlsx](#)

Richard,

re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Attached are the data in Verify as of February 5, 2013 (for new model year 2013 FE labels since January 3, 2012, only). Labels with pea green fill in the first few columns were not sent to DOE on February 5, 2013 for posting on the web. Error messages are in the first column with the column where the error occurred highlighted in yellow fill, as usual.

The next normal posting of 2013 FE Label data will be on March 1, 2013 or so (on a monthly schedule where I run the query on the 1st of the month). If you need an important 2013 FE Label posted on the web before that time, please send me an email message and I'll be glad to have it posted earlier.

Please make any needed corrections when you get a chance.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Fri 3/18/2011 12:17:33 PM  
**Subject:** RE: 2.0L TDI - Volkswagen Requests for Approval

Hi Jim:

Thanks for the quick response.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Thursday, March 17, 2011 5:10 PM  
**To:** Ex. 7  
**Subject:** Re: 2.0L TDI - Volkswagen Requests for Approval



Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA, **Ex. 7** @arb.ca.gov>

Date:

03/16/2011 03:03 PM

Subject:

2.0L TDI - Volkswagen Requests for Approval

Hello Jim and **Ex. 7**

Just a heads-up. I have submitted a request for approval of the upward and downward DPF regeneration adjustment factors for the 2012 model year 2.0L TDI test group CVWXV02.0U4S. The request was submitted to EPA and ARB through VERIFY and DMS respectively. These factors are determined as we have done so in the past for our DPF-equipped diesels.

Your attention to this matter would be appreciated. I would also appreciate an update on the status of the review of the SCR/AECD submittal for this test group.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 3/18/2011 6:15:11 PM  
**Subject:** VW Group Supplemental Information VID 411 10208 /12  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

We submitted today the Supplemental Information needed to schedule a test date for the 2012 VW Passat automatic diesel VID 411 10208 /12. Please let me know if you have further questions.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

To: Jim Snyder/AA/USEPA/US@EPA

Cc: Ex. 7

Ex. 7

From: Ex. 7

Sent: Mon 3/21/2011 12:48:41 PM

Subject: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Ex. 7

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVWXV03.6U41

Current test date: 03-28-2011

Best regards,

Ex. 7

VOLKSWAGEN Group of America, Inc.

Ex. 7

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/22/2011 2:25:10 PM  
**Subject:** RE: Lamborghini Revised Certificate Request - CNLXV06.5L83

Hello Jim,

I have update vehicle information to correct the engine code to L539A, re-submitted the application with the new CSI report, and also requested a new certificate.

I believe everything is ok now, but if you find any other issues please call me.

Thanks

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Tuesday, March 22, 2011 8:49 AM  
To: Giles, Michael  
Subject: Re: Lamborghini Revised Certificate Request - CNLXV06.5L83

Let me know if I need to deny the certificate request fro you to revise it. didn't want to reject it if not needed.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

To: Jim Snyder/AA/USEPA/US@EPA[]

Cc: Ex. 7

Ex. 7

From: Ex. 7

Sent: Tue 3/22/2011 4:12:59 PM

Subject: RE: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Ex. 7

Hi Jim,

As a follow up to my phone message. We are requesting that the below mentioned confirmatory test be rescheduled for May 18, 2011 or during that week if possible.

Regards,

Ex. 7

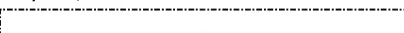
VOLKSWAGEN Group of America, Inc.

Ex. 7

From: Ex. 7

Sent: Monday, March 21, 2011 8:49 AM

To: Snyder, Jim

Cc:  **Ex. 7**

Subject: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVW XV03.6U41

Current test date: 03-28-2011

Best regards,



**Ex. 7**

VOLKSWAGEN Group of America, Inc.



**Ex. 7**





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 3/22/2011 6:08:35 PM  
**Subject:** RE: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

**Ex. 7**

Thanks Jim.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, March 22, 2011 2:05 PM  
To: Ex. 7  
Subject: Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 03/22/2011 02:04 PM -----

**From:** Ben Haynes/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/22/2011 01:48 PM  
**Subject:** Re: Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

I have moved this vehicle to 18May11.

Ben

From: Jim Snyder/AA/USEPA/US  
To: Ben Haynes/AA/USEPA/US@EPA  
Date: 03/22/2011 12:54 PM  
Subject: Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Ben, this is the vehicle that is delayed and requested to be pulled from schedule. They'd like it scheduled near the diesel 411 10208 /12.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

----- Forwarded by Jim Snyder/AA/USEPA/US on 03/22/2011 12:51 PM -----

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

**Ex. 7**

Date:

03/22/2011 12:14 PM

Subject:

RE: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hi Jim,

As a follow up to my phone message. We are requesting that the below mentioned confirmatory test be rescheduled for May 18, 2011 or during that week if possible.

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.

**Ex. 7**

From: **Ex. 7**

Sent: Monday, March 21, 2011 8:49 AM

To: Snyder, Jim

Cc: **Ex. 7**

Subject: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVWXV03.6U41

Current test date: 03-28-2011

Best regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Thur 3/24/2011 4:58:17 PM  
**Subject:** RE: Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I would like to know whether you have an opportunity to review the Lamborghini Bench Cycle request.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**From:** Ex. 7  
**Sent:** Wednesday, March 16, 2011 6:10 PM  
**To:** 'Snyder.Jim@epamail.epa.gov'; 'mitcham.arvon@epa.gov'  
**Subject:** Lamborghini Bench Cycle Request

Hello Jim and Arvon:

I wish to inform you that I have submitted, via VERIFY, a request for approval of a Lamborghini Bench Cycle. The cycle would be used for their V12 engine concept. The technical information is provided in the form of a slide presentation. If there are any questions, I can forward these back to Lamborghini. Further, Lamborghini technical staff is available to participate in a telephone conference if there are any detailed questions. I can easily set this up.

There is some urgency associated with the request for approval, so your attention to this matter would be appreciated.

Best regards,

**Ex. 7**

P.S. Arvon – I assumed that you are still involved in this topic, but if I am not correct, please let me know.

---

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 3/29/2011 12:11:14 PM  
**Subject:** VW Group application upload  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I wanted to clarify that the application and certificate request submitted yesterday for test group CVWXV03.6U41 is related to the upcoming confirmatory test for VID VW411 10206/12 scheduled on May 16th.

Let me know if you have any questions.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/29/2011 4:12:24 PM  
**Subject:** VW Group Decision Info Submitted - running change for addition of Beetle CVWXV02.5259

Hello Jim,

Today we submitted Decision Information for a new model:

- Previously certified test group CVWXV02.5259 (Bin 3)
- New carline: Beetle
- Automatic transmission
- Tested in a single configuration as an FEDV
- A running change to add this model will be forthcoming shortly.

Please Note: A similar running change for Beetle will be made for the Bin 5 test group CVWXV02.5U35

Finally, please note that in the future we will add manual transmission versions for this model.

Please contact me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road



Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/29/2011 5:36:03 PM  
**Subject:** RE: VW Group Decision Info Submitted - running change for addition of Beetle CVWXV02.5259

Hello Jim,

FYI, I just made a correction to this DI submission. There was an unnecessary Cold CO test included in the data set. It was removed with the correction.

- Mike

From: Giles, Michael  
Sent: Tuesday, March 29, 2011 12:12 PM  
To: Snyder, Jim  
Cc: Rodgers, William; Hart, Robert (VWoA)  
Subject: VW Group Decision Info Submitted - running change for addition of Beetle CVWXV02.5259

Hello Jim,

Today we submitted Decision Information for a new model:

- Previously certified test group CVWXV02.5259 (Bin 3)
- New carline: Beetle
- Automatic transmission
- Tested in a single configuration as an FEDV
- A running change to add this model will be forthcoming shortly.

Please Note: A similar running change for Beetle will be made for the Bin 5 test group CVWXV02.5U35

Finally, please note that in the future we will add manual transmission versions for this model.

Please contact me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Fri 4/1/2011 1:12:50 PM  
**Subject:** VW Group - Revised application / Running Change CVWXV02.5259

Hello Jim,

Yesterday we submitted a revised application and running change for test group CVWXV02.5259. This running change is for the following:

- 1) A name change to replace New Midsized Sedan (NMS) with Passat for evaporative family CVWXR0125P46
- 2) Add model Beetle to the test group for evaporative family CVWXR0110237.

Revised EPA certificates are needed. We submitted new certification requests this morning in Verify.

Please let me know if you need any other information on your end to proceed.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Fri 4/1/2011 8:33:49 PM  
**Subject:** FW: VW Group - Revised application / Running Change CVWXV02.5259

Hello Jim,

Today we submitted a new application for test group CADXV02.03PA / Evaporative family CADXR0110237.

Note, this is a carryover test group with no new models and dropping the Jetta model for MY2012.

A request for certificate was also made in Verify. Please let me know if there are any questions on your end.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 4/13/2011 8:20:43 PM  
**Subject:** RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

Ex. 7

Volkswagen Group of America, Inc.

Ex. 7

**From:** Ex. 7  
**Sent:** Friday, April 01, 2011 8:30 AM



To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 31, 2011 5:22 PM  
To: **Ex. 7**  
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA;Arvon Mitcham/AA/USEPA/US@EPA[]; rvon Mitcham/AA/USEPA/US@EPA[]  
**Cc:** **Ex. 7**  
**From:**  
**Sent:** Thur 4/14/2011 2:43:31 PM  
**Subject:** RE: Lambo ADP  
<mailto:Snyder.Jim@epamail.epa.gov>

Hello Jim and Arvon:

I am available between 11 AM and 3 PM today. Do you have specific questions regarding the Lamborghini submission? If so I can try to tie in the Lamborghini folks. You may recall that they volunteered to have a conference call.

Regarding the durability procedures used for MY 2011 and 2012, there are charts in Section 4 of the Common Section that identify the durability procedure used for each test group. For these model years, the general breakdown is essentially the same and is described below:

1. The majority of the test groups use the Volkswagen Alternate Durability Procedure (VWADP), which is a whole-vehicle, accelerated durability procedure that has been used for a number of years.
2. The Diesel test groups (2.0L TDI and 3.0L TDI), use the Standard Road Cycle.
3. EPA assigned DFs are used for three limited production concepts; namely the Bentley 63/4L Mulsanne, the Lamborghini V-12 Aventador, and the Bugatti.

Lamborghini is requesting approval of a bench cycle for use with a forthcoming 2012 test group.

At one point, we presented a Volkswagen Bench Cycle; however, this procedure is not used at the moment. There is a reference to this procedure in the Lamborghini Bench Cycle request, for comparison purposes. In addition, we have presented a Bench Cycle for diesels, but again, we are not there yet.

If you would like a list summarizing the application of the procedures, please let me know.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, April 13, 2011 5:38 PM  
To: **Ex. 7**  
Cc: Mitcham.Arvon@epamail.epa.gov  
Subject: RE: Lambo ADP

**Ex. 7** are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946

snyder.jim@epa.gov

From:

**Ex. 7**

To:

Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA

Date:

04/13/2011 04:21 PM

Subject:

RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From:

**Ex. 7**

Sent: Friday, April 01, 2011 8:30 AM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, March 31, 2011 5:22 PM

To: **Ex. 7**

Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Arvon Mitcham/AA/USEPA/US@EPA;

**Ex. 7**

**Ex. 7**

**From:** **Ex. 7**  
**Sent:** Thur 4/14/2011 4:02:54 PM  
**Subject:** RE: Lambo ADP  
<mailto:Snyder.Jim@epamail.epa.gov>  
<mailto:Snyder.Jim@epamail.epa.gov>

Hello Jim and Arvon:

Much appreciated!

I have told Lambo the good news.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, April 14, 2011 11:37 AM  
To: [REDACTED] Ex. 7  
Cc: Mitcham.Arvon@epamail.epa.gov; [REDACTED] Ex. 7  
Subject: RE: Lambo ADP

Thanks for the note clarifying the various methods used. Arvon and I discussed it and agreed that you are okay. He will send VW and Lamborghini a formal letter of approval but you can submit cert requests before then too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: [REDACTED] Ex. 7  
To: Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
Cc: [REDACTED] Ex. 7  
Date: 04/14/2011 10:44 AM  
Subject: RE: Lambo ADP

Hello Jim and Arvon:

I am available between 11 AM and 3 PM today. Do you have specific questions regarding the Lamborghini submission? If so I can try to tie in the Lamborghini folks. You may recall that they volunteered to have a conference call.

Regarding the durability procedures used for MY 2011 and 2012, there are charts in Section 4 of the Common Section that identify the durability procedure used for each test group. For these model years, the general

breakdown is essentially the same and is described below:

1. The majority of the test groups use the Volkswagen Alternate Durability Procedure (VWADP), which is a whole-vehicle, accelerated durability procedure that has been used for a number of years.
2. The Diesel test groups (2.0L TDI and 3.0L TDI), use the Standard Road Cycle.
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Lamborghini is requesting approval of a bench cycle for use with a forthcoming 2012 test group.

At one point, we presented a Volkswagen Bench Cycle; however, this procedure is not used at the moment. There is a reference to this procedure in the Lamborghini Bench Cycle request, for comparison purposes. In addition, we have presented a Bench Cycle for diesels, but again, we are not there yet.

If you would like a list summarizing the application of the procedures, please let me know.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, April 13, 2011 5:38 PM  
To: **Ex. 7**  
Cc: Mitcham.Arvon@epamail.epa.gov  
Subject: RE: Lambo ADP

Len, are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

**Ex. 7**



To:

Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA

Date:

04/13/2011 04:21 PM

Subject:

RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

**Ex. 7**

Volkswagen Group of America, Inc.

**Ex. 7**

From: **Ex. 7**

Sent: Friday, April 01, 2011 8:30 AM

To: 'Snyder.Jim@epamail.epa.gov'

Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 31, 2011 5:22 PM  
To: Ex. 7  
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Fri 4/15/2011 6:23:30 PM  
**Subject:** VW Group - Certificate Request for new diesel test group CVWXV02.0U4S

Hello Jim,

Today we submitted application documents and a certificate request for the new diesel test group CVWXV02.0U4S (Passat).

Note, we are requesting a conditional certificate for this test group. A confirmatory test for this vehicle is scheduled ~ May 18th.

Please let myself or Bill Rodgers know if there are any issues with this moving forward.

Best Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 4/19/2011 3:46:09 PM  
**Subject:** VW Group Decision Information - CADXV02.53UK  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I submitted tests and decision information for the new 2012 Audi test group CADXV02.53UK. This is for a performance variant of the Audi TT with 360 horsepower. There is no new technology involved, however, it represents the first combination of exist (VW) 5-cylinder in-line engine with all-wheel drive and direct injection turbocharging (TFSI). Let me know if you have any questions.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ted Trimble/OU=AA/O=USEPA/C=US@EPA[]; N=Ted Trimble/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/20/2011 2:32:15 PM  
**Subject:** Fw: New 2010 ABT template attached  
[ABT Report Template 1 5 2011.xlsx](#)  
(embedded image)

Richard,

Here's the new AB&T template---although Mitsubishi found an error in the new template . As we discussed today, detailed fleet average calculations (using the template) are not needed if all of the manufacturer's vehicles are certified at or below the fleet average NOx standard----and the mfr doesn't want to bank credits, etc. See 86.1860-04(c)(2) and 86.1862-04(b)(2).

Ted Trimble is the EPA lead on AB&T issues----so please work with him if the template needs corrections.

Mitsubishi found the following error in the new template: "In the "current MY credit calculation" tab, when we enter "150k" useful life in column F, and "NO" in column G, we still get a incorrect value of 0.85 in column L. The correct value in column L should be 1. Any advise or fix?"

There may be other errors. I'm not sure if any manufacturers have sent their AB&T calculations to EPA using the revised template or not---Ted might know.

Regards

----- Forwarded by David Good/AA/USEPA/US on 04/20/2011 09:52 AM -----

**From:** Ted Trimble/AA/USEPA/US  
**To:** OAR-OTAQ-CISD-LDVG  
**Date:** 04/18/2011 03:41 PM  
**Subject:** ABT template

For 2010 and beyond, Mary's group has reworked the template for recording ABT reports. The old template did not accept a letter as the first character in the engine family, the new one does.

Ted Trimble, Mechanical Engineer  
CCD, USEPA  
734 214 4289

**To:** "Rodgers, William" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Wed 4/20/2011 8:04:15 PM  
**Subject:** VW Group - Decision Infomration sent VW Beetle  
<http://content.usatoday.com/communities/driveon/post/2011/04/2012-vw-beetle-global-us-bigger-/1?csp=34>  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

As a follow up to the message below, I just submitted the Decision Information for fuel economy tests for the 2012 Beetle (BIN 5/ULEV, automatic) for test group CADXJ02.03UA.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

From: Rodgers, William  
Sent: Wednesday, April 20, 2011 12:47 PM

To: Snyder, Jim  
Cc: Giles, Michael  
Subject: VW Beetle

Hi Jim,

Thought you might like to see the next generation 2012 Beetle below. I just submitted a decision information for the turbo version in test group CVWXV02.03PA (Bin 3/SULEV). As a heads up, Mike Giles will be submitting the corresponding Bin 5/ULEV tests soon.

<http://content.usatoday.com/communities/driveon/post/2011/04/2012-vw-beetle-global-us-bigger-/1?csp=34>

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;richard.thomas@vw.com[];  
ichard.thomas@vw.com[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 4/22/2011 6:52:24 PM  
**Subject:** Re: CADXT03.23UC fee payment

I forwarded it to Richard. Bill did receive an Audi payment but it didn't have the full group name on it and no fee form.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 04/22/2011 02:42 PM  
**Subject:** CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently ?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Fri 4/22/2011 6:54:40 PM  
**Subject:** RE: CADXT03.23UC fee payment  
CertFee\_CADXT03.23UC.pdf

Hello Jim,

I have attached the fee filing form for this test group. I will have Bill Rodgers (he's not in today) upload a revised application with the form included on Monday.

The form was submitted on 7-Apr-11. The money transfers are done on Thursdays and that was three Thursdays ago.

I'll have to make sure my replacements are using an application checklist to make sure they get it right the first time.

Sorry for the confusion.

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, April 22, 2011 2:43 PM  
To: Rodgers, William  
Cc: Hart, Robert (VWoA)  
Subject: CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently ?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM**

**FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2011**

Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48309

**On-Highway Certification Request Type (check one)**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$33,974) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$34,452)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$55,252) |

EPA standard engine family or test group or  
HDV Evaporative family name:

C	A	D	X	T	0	3	.	2	3	U	C
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Amount paid (U.S. Funds Only):

\$ 33,974.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT

**Reduced Fee Section (40 CFR §1027.120)**

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard E. Thomas

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2011

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: **Forms** may be found and submitted with or without **payments** online at [www.Pay.gov](http://www.Pay.gov).  
(2) Send **checks** and this **form** to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000**

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This form expires: 1/1/2012

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** CN=Willem VandenBroek/OU=AA/O=USEPA/C=US  
**Sent:** Mon 4/25/2011 11:11:33 AM  
**Subject:** Re: Fw: CADXT03.23UC fee payment

Notwithstanding, EPA had not received this form on April 7 or any other date.

EPA has one unobligated ACH payment from Volkswagen, processed on April 15, for \$135,896 = 4 x \$33,974 LDV certification fees. I will take this family out of that payment. We have not received forms indicating Volkswagen's intentions for the remainder of this payment.

Bill Vanden Broek  
MVECP Fees  
734-214-4468

**From:** Jim Snyder/AA/USEPA/US  
**To:** Willem VandenBroek/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 04/22/2011 03:11 PM  
**Subject:** Fw: CADXT03.23UC fee payment

Thanks Bob.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 04/22/2011 03:10 PM -----

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 04/22/2011 02:54 PM  
**Subject:** RE: CADXT03.23UC fee payment

Hello Jim,

I have attached the fee filing form for this test group. I will have Bill Rodgers (he's not in today) upload a revised application with the form included on Monday.

The form was submitted on 7-Apr-11. The money transfers are done on Thursdays and that was three Thursdays ago.

I'll have to make sure my replacements are using an application checklist to make sure they get it right the first time.

Sorry for the confusion.

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, April 22, 2011 2:43 PM  
To: Rodgers, William  
Cc: Hart, Robert (VWoA)  
Subject: CADXT03.23UC fee payment

No record of receiving payment yet. I couldn't find a copy of the Fee payment form in the Part 1 either. I can't go to Bill without the payment form. Was it paid very recently ?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov[attachment "CertFee\_CADXT03.23UC.pdf" deleted by Willem VandenBroek/AA/USEPA/US]

**To:** Fees@EPA[]  
**Cc:** Willem VandenBroek/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William" [William.Rodgers@vw.com]; Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 4/25/2011 11:12:21 AM  
**Subject:** 3 Audi - One Volkswagen Certification Fee Filing Forms  
[2012 three Audi TG Cert Fee Filing forms to EPA.pdf](#)  
[2012 EPA Cert Fees CVWXV02.0U5N to EPA.pdf](#)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Please find attached the certification fee filing forms for three Audi test groups, and one Volkswagen test group. These fees were processed/paid, on the Volkswagen end, on April 15, 2011.

If there are any questions please contact me directly.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)



**U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM**

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Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48309

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$33,974) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$34,452)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$55,252) |

EPA standard engine family or test group or  
HDV Evaporative family name:

C	A	D	X	T	0	3	.	2	3	U	C
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Amount paid (U.S. Funds Only):

\$ 33,974.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT

**Reduced Fee Section (40 CFR §1027.120)**

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


**Ex. 6**

Company Representative: Richard E. Thomas Signature: \_\_\_\_\_

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2011

E-mail Address: Richard.Thomas@VW.com

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**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000**

- (3) Transmit offline **EFT/Wire payments** to the New York Federal Reserve Bank. (See Instructions, p.2)
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This form expires: 1/1/2012



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MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
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Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48309

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$33,974) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
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| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$34,452)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$55,252) |

EPA standard engine family or test group or  
HDV Evaporative family name:

C	A	D	X	V	0	4	.	2	3	6	5
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Amount paid (U.S. Funds Only):

\$ 33,974.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT

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Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


**Ex. 6**

Company Representative: Richard E. Thomas Signature: \_\_\_\_\_

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2011

E-mail Address: Richard.Thomas@VW.com

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This form expires: 1/1/2012



**U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM**

FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2011

Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48309

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
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|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$55,252) |

EPA standard engine family or test group or  
HDV Evaporative family name:

C	A	D	X	V	0	4	.	2	3	7	5
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only):

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Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT

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**Ex. 6**

Company Representative: Richard E. Thomas Signature: \_\_\_\_\_

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2011

E-mail Address: Richard.Thomas@VW.com

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| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$17,255)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
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|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$55,252) |

EPA standard engine family or test group or  
HDV Evaporative family name:

C	V	W	X	V	0	2	.	0	U	5	N
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Amount paid (U.S. Funds Only):

\$ 33,974.00

Enter the check number, or the statement "EFT/WIRE" or "EFT/ACH":

EFT

**Reduced Fee Section (40 CFR §1027.120)**

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/engines covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/engines: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


**Ex. 6**

Company Representative: Richard E. Thomas

Signature: \_\_\_\_\_

Title: Emission Cert Strategist Phone/Fax: 248 754 4213 / 248 754 4207 Date: 4 / 7 / 2011

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: **Forms** may be found and submitted with or without **payments** online at [www.Pay.gov](http://www.Pay.gov).  
(2) Send **checks** and this **form** to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000**

- (3) Transmit offline EFT/Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline EFT/ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) **Forms** not submitted under (1) and (2) above can be sent as email attachments to [Fees@epa.gov](mailto:Fees@epa.gov).  
Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 1/1/2012

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 4/27/2011 3:24:53 PM  
**Subject:** VW Group - VID: C3UK-AMQ Decision/Supplemental information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted a correction to the Decision Information input for Audi test group: CADXV02.53UK, VID: C3UK-AMQ, requesting that the vehicle be delivered to EPA on May 23rd and hopefully tested on May 25th to coincide with the already scheduled Audi Q7 tests that week.

In addition, I submitted the Supplemental Information for this vehicle with Shift Schedule ID's for filler-only purposes, as noted in the comments section. The correct (new) Manual 6-speed shift schedules are being preparing and will be uploaded in the near future, prior to the test date.

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 4/27/2011 5:39:52 PM  
**Subject:** VW Group - Test Question  
[image001.gif](#)

Hi Jim,

Is the diesel US06 testing to be performed on this vehicle intended to be both (test type 90) one bag tests for particulate measurement, or did you mean one test to be a (test type 89) two bag?

Thanks,

Bill

**From:** Verify Administrator  
**Subject:** Vehicle selected for Test B3UG-TAQ, Supplemental Information needed  
**Date:** Fri 4/22/2011 1:52 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: ADX Vehicle ID: B3UG-TAQ Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 2 - CVS 75 and later (w/o can. load) 19 - Cert Diesel 7-15 ppm Sulfur 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 3 - HWFE 19 - Cert Diesel 7-15 ppm Sulfur

Vehicle ID: B3UG-TAQ

Vehicle Configuration #: 0

Test Group Name: CADXT03.03UG

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 4/28/2011 11:57:40 AM  
**Subject:** RE: VW Group - Test Question  
[image001.gif](#)

Thanks Jim.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, April 27, 2011 4:26 PM  
To: Rodgers, William  
Subject: Re: VW Group - Test Question

I scheduled both a 2bag and a 1bag US06. On my side of Verify, they are both shown as code 90 but one will change to 89 in the lab's system.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Rodgers, William" <William.Rodgers@vw.com>  
  
To:  
Jim Snyder/AA/USEPA/US@EPA  
  
Date:  
04/27/2011 01:39 PM  
  
Subject:  
VW Group - Test Question

Hi Jim,  
Is the diesel US06 testing to be performed on this vehicle intended to be both (test type 90) one bag tests

for particulate measurement, or did you mean one test to be a (test type 89) two bag?

Thanks,  
Bill

From:

Verify Administrator

Subject:

Vehicle selected for Test B3UG-TAQ, Supplemental Information needed

Date:

Fri 4/22/2011 1:52 PM

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Manufacturer: ADX Vehicle ID: B3UG-TAQ Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 2 - CVS 75 and later (w/o can. load) 19 - Cert Diesel 7-15 ppm Sulfur 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 3 - HWFE 19 - Cert Diesel 7-15 ppm Sulfur

Vehicle ID: B3UG-TAQ

Vehicle Configuration #: 0

Test Group Name: CADXT03.03UG

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 4/29/2011 1:21:50 PM  
**Subject:** VW Group - Certification Requests for ADX\_2UG and ADX\_3UG  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I have uploaded initial applications and certification requests for the following test groups for your review and approval:

CADXT03.02UG – VW Touareg TDI (LDT3)

This is a carryover from 2011 model year with no changes. VW group has agreed to pay penalties for two of the four OBD deficiencies described in the OBD approval letter found in the application.

CADXT03.03UG – Audi Q7 TDI (LDT4)

This is a carryover test group with new tests for 2012. VW group has agreed to pay penalties for two of the four OBD deficiencies described in the OBD approval letter found in the application.

A conditional certificate is requested pending EPA confirmatory testing scheduled for the related VID B3UG-TAQ.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/ \_ \.  
(o\l\_/o)

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 4/29/2011 9:41:27 PM  
**Subject:** re: 2012 FE Guide data for web posting on May 23, 2011 - Please review & let EPA know after the Verify data is error free and ready for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW-2012 FE Guide.zip](#)

Richard,

Attached are Excel Spreadsheets for each manufacturer which you are handling.

The spreadsheet(s) are encrypted & password protected. I'll call you with the password---or you can call me at 734-214-4450 to get the password.

The spreadsheet(s) contain all the 2012 FE label data from EPA's Verify data base as of April 26, 2011. Please review the attached data for errors (including my comments in the first column) and make the appropriate corrections in Verify. Please double check any new FE Labels which you input into Verify (not listed in this spreadsheet) to make sure they are error free. Any corrections should be made directly in the EPA Verify database. [Do not correct the spreadsheet and send it back.] I am forwarding the schedule for the May, 2011 release and some "reminders" for your convenience.

The models highlighted in green fill (if any) contain errors and will not be sent to DOE for web posting unless the errors are corrected.

The last date to make changes for the web posting is May 11, 2011. EPA will review the data on May 12 and forward it to DOE on (or before) May 18 for posting on the web on May 23, 2011.

Please let me know when you have made all corrections, entered any new labels into Verify and everything is "good to go."

Thanks

----- Forwarded by David Good/AA/USEPA/US on 04/29/2011 04:53 PM -----

**From:** David Good/AA/USEPA/US  
**To:** Auto Manufacturer FE Label personnel  
**Cc:**  
**Date:** 04/26/2011 01:55 PM  
**Subject:** Fw: 2012 FE Guide - Schedule for May, 2011 web release on [www.fueleconomy.gov](http://www.fueleconomy.gov) [Revised schedule attached]

To manufacturers,

I revised the implementation schedule slightly for the May 2011 release of the 2012 FE Guide on [www.fueleconomy.gov](http://www.fueleconomy.gov).



Since EPA's contractor will be deploying Verify Release 3 changes on May 13, 2011, the revised schedule will make it easier for manufacturers to enter data and make corrections to Verify. It will also make it easier for EPA review the 2012 FE Guide data in Verify. The new schedule makes the following changes:

The last day for manufacturers to make corrections will now be by May 11 (instead of May 16);  
EPA will perform the FE Guide Verify query (for EPA review) on May 12 (instead of May 17).

The revised schedule is as follows:

Date	Action
Apr 26 (Tues)	EPA Verify staff performs 2012 FE Guide Verify query (separated by mfr, etc) for EPA review
Apr 27 (Wed)	EPA sends FE Guide data to manufacturers for review & corrections; also sends prelim data to DOE
Apr 28-May 11	Mfrs review & make corrections
May 11 (Wed)	Last day for manufacturers to make corrections and add new data
May 12 (Thur)	EPA Verify staff performs 2012 FE Guide Verify query for EPA review
May 18 (Wed)	EPA sends final data to DOE
May 23 (Mon)	DOE publishes 2012 FE Guide data on web

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by May 11, 2011) will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov). For example, FE Labels will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the May release, we will post FE Labels on the web which have a release date of May 23, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISC-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISC-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISC-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at

734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Fri 5/6/2011 11:58:57 AM  
**Subject:** VW Group - Certificate Request for carryover test group CVWXT03.0HEV

Hello Jim,

We have submitted application documents and a certificate request for test group CVWXT03.0HEV (Touareg Hybrid).

Please note this is a carryover test group with no new models or tests.

Best Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Mon 5/9/2011 6:29:07 PM  
**Subject:** 2012 Volkswagen and Audi Fuel Economy Labels

Hello Bob;

I understand that Dave Ex. 6 this week, however he said that you may be able to process the query program so that any fixes I did and any new labels would be added to the first edition of the web site fuel economy guide.

After Dave's report from late Friday, I fixed problems with model index VWX026, 027 and 028 this morning and added new Volkswagen indexes VWX022, 023, 024, 025, 44, 45, 46 and two Audi indexes ADX040 and 041.

If you have any questions, or if I should direct this to someone else, please call.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]; Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]  
**From:** "Rodgers, William"  
**Sent:** Tue 5/10/2011 11:41:31 AM  
**Subject:** VW Group - Vehicle ID: C3UK-AMQ shift schedules updated  
[image001.gif](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We have updated the Supplemental Information for the follow vehicle to include all new manual transmission shift schedules. This vehicle is schedule for confirmatory testing no May 25th. Please be sure your lab receives this new information prior to testing.

**From:**  
Verify Administrator

**Subject:**  
Supplemental Information received

**Date:**  
Tue 5/10/2011 7:31 AM

Your recent Supplemental Information submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1  
Accepted Datasets: 1  
Rejected Datasets: 0

Vehicle ID: C3UK-AMQ

Vehicle Configuration #: 0

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 5/18/2011 6:33:27 PM  
**Subject:** Problem with Verify that requires EPA permission to correct.

Hello Jim,

The Verify Helpdesk said to inform you of this so that someone at the EPA can give them permission to check/correct this issue.

When we submit either HWFET or SC03 tests to the Verify System we get the following business rule as an error message for the submission.

Transaction Message Text : LD-CTD-TI-BR049a - If Test Results with Test Result/Emission Name (TI-19) equal to 'FE BAG 1' (Bag 1 Fuel Economy) is submitted then Test Results with Test Result/Emission Name (TI-19) equal to 'FE BAG 2' (Bag 2 Fuel Economy) must also be submitted

Both the HWFET or SC03 tests are one bag tests. The business rule is asking for the 'FE BAG 2' results. There are no BAG 2 results to submit for either of these tests.

Based on this and some of the other problems we are having, I would have to say that someone pulled the trigger to launch this new module before it was fully tested.

I would have liked to participate in the testing, but my login for the test environment was messed up and was not fixed by the time the testing ended.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)



**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**From:** CN=Sandra Somoza/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/18/2011 7:18:20 PM  
**Subject:** Re: Fw: Problem with Verify that requires EPA permission to correct.

Bob,

What helpdesk number did you call and who did you talk too?

Sandra Somoza  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance and Innovative Strategies Division  
734 214-4704  
somoza.sandra@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: Sandra Somoza/AA/USEPA/US@EPA  
Date: 05/18/2011 02:52 PM  
Subject: Fw: Problem with Verify that requires EPA permission to correct.

Sandra, It looks like Bob found a glitch in the new release. Who should I pass this on to?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/18/2011 02:50 PM -----

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/18/2011 02:34 PM  
Subject: Problem with Verify that requires EPA permission to correct.

Hello Jim,

The Verify Helpdesk said to inform you of this so that someone at the EPA can give them permission to check/correct this issue.

When we submit either HWFET or SC03 tests to the Verify System we get the following business rule as an error message for the submission.

Transaction Message Text : LD-CTD-TI-BR049a - If Test Results with Test Result/Emission Name (TI-19)

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Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Robert Hart" [Robert.Hart@vw.com]; erifyHelp@csc.com[]  
**Cc:** CN=Sandra Somoza/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Richard Thomas" [Richard.Thomas@VW.Com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Richard Thomas" [Richard.Thomas@VW.Com]; Richard Thomas" [Richard.Thomas@VW.Com]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/18/2011 7:33:02 PM  
**Subject:** Re: Fw: Problem with Verify that requires EPA permission to correct.

Bob / Verify Help,

The fuel economy results for the entire "Test" belong in a test result field named "MFR FE". Volkswagen has previously put them in the "FE BAG 1" results (incorrectly). Over the last year I have had Richard Thomas go back and resubmit several tests to move them to the "MFR FE" field. As you mentioned, this applies to both highway and SC03 tests.

"FE BAG 1" should only be used in cases where there are multiple bags, so "FE BAG 1" will not be accepted unless "FE BAG 2" is also present.

Likewise, "FE BAG3" will only be accepted if both "FE BAG 1" and "FE BAG2" are present, etc.

In the case where there are multiple bags, the fuel economy for the entire "Test" should also be present in "MFR FE".

To help Richard out on several occasions in the past, I have made special provisions in the fuel economy calculations (specific for VW) to pull the fuel economy out of that field if "MFR FE" was left blank and BAG 2 was left blank. This was only to avoid him having to go back and resubmit all of the highway and SC03 tests. I am trying to avoid having to do custom fixes whenever possible. Our contractor will be implementing the fuel economy calculations in the near future, and this business rule is intended to avoid them having to implement similar provisions when they perform the calculations.

The business rule is working as intended. Please enter the "Test" fuel economy results in "MFR FE".

Additional note: The litmus calculations are now performed by Verify. They require that "Verify Calculated Rounded Adjusted Fuel Economy" be calculated and stored for the FTP (75 degree), highway, and SC03 tests. They have always been calculated for the FTP and highway. Any SC03 test submitted before this deployment of the database may have to be resubmitted in order to get Verify to calculate this result. So you may need to resubmit some of your SC03 tests anyway. (Only the ones referenced as the "Official SC03 Test Number" in your test group submission)

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfe/>

From: Sandra Somoza/AA/USEPA/US  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 05/18/2011 02:55 PM  
Subject: Fw: Problem with Verify that requires EPA permission to correct.

Bob,

Can you look into the error below? Is this one of the issues we are aware of?

Sandra Somoza  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance and Innovative Strategies Division  
734 214-4704  
somoza.sandra@epa.gov  
----- Forwarded by Sandra Somoza/AA/USEPA/US on 05/18/2011 02:55 PM -----

From: Jim Snyder/AA/USEPA/US  
To: Sandra Somoza/AA/USEPA/US@EPA  
Date: 05/18/2011 02:52 PM  
Subject: Fw: Problem with Verify that requires EPA permission to correct.

Sandra, It looks like Bob found a glitch in the new release. Who should I pass this on to?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/18/2011 02:50 PM -----

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/18/2011 02:34 PM  
Subject: Problem with Verify that requires EPA permission to correct.

Hello Jim,

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I would have liked to participate in the testing, but my login for the test environment was messed up and was not fixed by the time the testing ended.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/19/2011 2:35:37 PM  
**Subject:** 411 10206/12  
[411 1020612 05-18-11.pdf](#)

Hello Bob,

Please find enclosed the FTP, Hwy, & US06 for the Subject vehicle.

I checked with the Lab and we will not run the Diesel vehicle tomorrow. It will be next week. I'll contact you with a test date.

If you have any questions please contact Jim Snyder or me.

Thanks Bob,

Kind regards,

Vince Mazaitis

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-004

Vehicle ID: 411 10206 /12

## Test Information



Test Date: 5/18/2011

MFR Name VOLKSWAGEN

Key Start / Hot Soak: 08:21:18 / 09:38

MFR Codes: 590 VWX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: S

Test Procedure: 21 Federal fuel 2-day exhaust (w/can load)

Shift Schedule: A09980005

Calculation Method: Gasoline

Beginning Odometer: 003815.0 MI

Pretest Remarks:

Drive Schedule: ftp3bag

Soak Period: 17.6 hours

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	10.998	31.403	0.535	0.977	2.750	
Ambient	4.491	0.184	0.042	0.048	1.968	
Net Concentration	6.836	31.232	0.496	0.933	0.926	5.812

Remarks:

### Phase 2

Sample	5.609	0.732	0.241	0.658	1.946	
Ambient	5.836	0.303	0.037	0.047	1.959	
Net Concentration	0.060	0.444	0.206	0.613	0.083	-0.032

Remarks:

### Phase 3

Sample	9.904	2.646	0.226	0.854	2.161	
Ambient	10.255	0.386	0.033	0.047	1.958	
Net Concentration	0.304	2.285	0.195	0.810	0.328	-0.059

Remarks:

### Phase 4

Sample						
Ambient						
Net Concentration						

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.087	0.804	0.019	377.3	0.014	0.074 / 0.077	23.558
Phase 2	0.001	0.018	0.013	395.4	0.002	0.000 / 0.000	22.572
Phase 3	0.004	0.059	0.008	327.1	0.005	0.000 / 0.000	27.281
Weighted	0.01976	0.19227	0.01265	372.879	0.00517	(NMOG=1.04xNMHC) 0.0154 / 0.0160	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #:
Phase 1	23.50		D001
Phase 2	22.52		Inertia: 3750
Phase 3	27.22		EPA Set Co A: 15.88
			EPA Set Co B: 0.0372
			EPA Set Co C: 0.01923
Weighted	23.85		Emiss-Bench: D001

v101208 - d001 Emission110518080442

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# NVFEL Laboratory Test Data

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## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-004

Vehicle ID: 411 10206/12

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.313	2.887	0.069	1354.6	0.049	0.266	1.106
Phase 2	0.005	0.070	0.049	1525.0	0.008	0.000	
Phase 3	0.014	0.211	0.027	1173.2	0.017	0.000	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.90	28.90	28.91	
Avg Cell Temp (degF)	73.12	73.16	73.20	
Dew Point (degF)	50.10	50.05	50.01	
Specific Humidity (grains/lbm)	55.66	55.56	55.47	
NOx Corr Factor	0.9167	0.9163	0.9159	
CO2 Dilution Factor	13.656	20.345	15.668	
CFV Vmix (scf @68F)	2803.83	4799.31	2795.54	
CVS Flow Rate Avg (scfm)	331.36	330.91	330.44	
Fan Placement: One Fan - Down - Front				
Phase Time (secs)	507.70	870.20	507.60	
Distance (miles)	3.590	3.857	3.587	
Bag Analysis Time (secs)				

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0235	0.28	0.008	372	0	0.0178
Odometer	MPG	PM				
3689 M	23.9	0.004				

MPG is 0.21 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline



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# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-006

Vehicle ID: 411 10206 /12

## Test Information



Test Date: 5/18/2011

Key Start: 09:42:17

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Calculation Method: Gasoline

Pretest Remarks:

MFR Name VOLKSWAGEN

MFR Codes: 590 VWX

Config #: 00

Transmission: S

Shift Schedule: A09980011

Beginning Odometer: 003826.0 MI

Drive Schedule: hwfetwarmup\_hwfet

## Bag Data

	HC-FID	CO	NOx	CO2	CH4	NonMeth HC
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Phase 1						
Sample	11.395	4.215	0.153	1.182	2.153	
Ambient	11.622	0.489	0.026	0.047	1.976	
Net Concentration	0.800	3.769	0.129	1.139	0.352	0.411

Remarks:

## Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.005	0.051	0.003	240.0	0.003	0.003 / 0.003	37.178

(NMOG=1.04xNMHC)

## Fuel Economy

	Gasoline MPG	Coastdown secs:		Dyno Settings	Dyno #:
Phase 1	37.09		19.24		D001
			19.27		Inertia: 3750
			19.29		EPA Set Co A: 15.88
					EPA Set Co B: 0.0372
					EPA Set Co C: 0.01923
			19.27		Emiss-Bench: D001

v101208 - d001 Emission110518092203

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# NVFEL Laboratory Test Data

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## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-006

Vehicle ID: 411 10206 /12

### Results



	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.054	0.518	0.027	2462.1	0.028	0.028	1.106

### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.91			
Avg Cell Temp (degF)	73.31			
Dew Point (degF)	50.13			
Specific Humidity (grains/lbm)	55.71			
NOx Corr Factor	0.9169			
CO2 Dilution Factor	11.322			
CFV Vmix (scf @68F)	4171.76			
CVS Flow Rate Avg (scfm)	327.15			
Fan Placement:	One Fan - Down - Front			
Phase Time (secs)	765.20			
Distance (miles)	10.260			
Bag Analysis Time (secs)				

### MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0024	0.02	0.002	238	0	0.0011
<u>Odometer</u>	<u>MPG</u>	PM				
3700 M	37.3	0.004				

MPG is 0.56 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

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## NVFEL Laboratory Test Data

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-005

Vehicle ID: 411 10206 /12

## Test Information

Test Date: 5/18/2011

MFR Name VOLKSWAGEN

Key Start: 10:41:44

MFR Codes: 590

VWX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: S

Test Procedure: 89 us062bag (us06warmup\_2bagus06)

Shift Schedule: A09980041

Calculation Method: Gasoline

Beginning Odometer: 003850.0 MI

Pretest Remarks:

Drive Schedule: us06warmup\_2bagus06



## Bag Data

## Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	10.295	15.815	0.734	0.960	2.650	
Ambient	6.710	1.358	0.059	0.049	1.971	
Net Concentration	4.067	14.555	0.679	0.915	0.821	3.159

Remarks:

## Phase 2

Sample	11.518	16.907	0.514	1.335	2.871	
Ambient	6.769	1.350	0.060	0.049	1.961	
Net Concentration	5.425	15.692	0.460	1.291	1.106	4.202

Remarks:

## Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.069	0.496	0.035	489.8	0.016	0.053 / 0.055	18.186
Phase 2	0.040	0.234	0.010	302.6	0.009	0.031 / 0.032	29.451
Composite	0.04641	0.29213	0.01564	344.072	0.01091	(NMOG=1.04xNMHC) 0.0360 / 0.0374	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #: D001
Phase 1	18.14		Inertia: 3750
Phase 2	29.38		EPA Set Co A: 15.88
			EPA Set Co B: 0.0372
			EPA Set Co C: 0.01923
Composite	25.84		Emiss-Bench: D001

v101208 - d001 Emission110518101633

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Print Time 18-May-2011 13:12

# NVFEL Laboratory Test Data

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## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0115-005

Vehicle ID: 411 10206 /12

### Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.122	0.880	0.061	869.4	0.028	0.095	1.106
Phase 2	0.250	1.459	0.064	1885.6	0.059	0.193	

### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.91	28.91		
Avg Cell Temp (degF)	73.49	73.78		
Dew Point (degF)	48.67	49.54		
Specific Humidity (grains/lbm)	52.72	54.48		
NOx Corr Factor	0.9052	0.9121		
CO2 Dilution Factor	13.920	10.016		
CFV Vmix (scf @68F)	1834.86	2819.34		
CVS Flow Rate Avg (scfm)	466.49	463.45		
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	130.00	365.00	106.00	
Distance (miles)	1.775	6.232		
Bag Analysis Time (secs)				

### MFR Test Results

for Procedure 90 US06

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0337	0.25	0.008	341	0	0.0256

<u>Odometer</u>	<u>MPG</u>	<u>PM</u>
3728 M	26	0.004
MPG is 0.62 % higher than EPA MPG		

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21  
Fuel: 61 Tier 2 Cert Gasoline

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/19/2011 8:13:51 PM  
**Subject:** re: 2012 FE Label data in EPA data base as of May 13, 2011 is attached for your review (including data sent to DOE for web posting)  
[VW 2012 FEGuide-5-13-2011.zip](#)  
[verifyhelp@csc.com](mailto:verifyhelp@csc.com)

Richard,

The attached 2012 FE Label data for the manufacturer(s) which you are handling were forwarded to DOE on May 17, 2010 for posting on the web at [www.fueleconomy.gov](http://www.fueleconomy.gov). [Only releasable, non-confidential data were forwarded to DOE.] The attached spreadsheet(s) are encrypted & password protected using the same password which I gave you previously.

The attached spreadsheet(s) include all 2012 FE Label data in EPA's Verify data base as of May 13, 2011 approximately 2 hours before Verify Release 8 was deployed. Note that the attached spreadsheet(s) also include data which were not forwarded to DOE because the data contains errors or the release date was after May 24, 2010.

Releasable data will be posted on the web this week (the week of May 16, 2011). The models highlighted in green fill (if any) contain errors and were not sent to DOE for web posting. If the release date was prior to May 24, 2011 for these models, I'll be glad to send the corrected data to DOE for web posting after the errors have been corrected in Verify.

Please review the data and correct Verify if any errors still exist. Please contact me if you find any errors in the releasable data which was sent to DOE for web posting.

For your convenience, here are 1) EPA's May 18, 2011 list server message (explaining how to make corrections to data already in Verify before the May 13, 2011 deployment of Verify Release 8); and 2) my FE Label "reminders" which I sent to manufacturers in previous email messages:

EPA Verify List Server message, as sent to manufacturers on May 18, 2011:

Updated XML schemas, XML schema change log, data requirements and business rules are now available on the Verify website in support of the recent Light-Duty Greenhouse Gas and Fuel Economy updates (Release 8). [Available at <http://www.epa.gov/otaq/verify>; then click on "Publications," then click on "Light-Duty Vehicle (LDV)."]

If you have any questions or comments please contact the Verify Help Desk at (888) 890-1995 or via email at [verifyhelp@csc.com](mailto:verifyhelp@csc.com).

As a reminder, in order to make any changes to datasets that were already in Verify prior to the Release 8 updates, you will need to:

- 1) select the "Request Database Report" in order to receive a newly formatted XML file for that dataset in your CDX in-box;
- 2) save that XML file on your workstation;
- 3) select the "Open Existing Dataset" option and select the XML file saved in step 2;
- 4) make any changes to the dataset using the Verify web forms;

5) submit the modified dataset.

FE Label Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by May 11, 2011) will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov). For example, FE Labels will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the May release, we will post FE Labels on the web which have a release date of May 23, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISC-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISC-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISC-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]; Rhodes, Brian" [Brian.Rhodes@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Fri 5/20/2011 12:00:52 PM  
**Subject:** VW Group - VID 411\_10206\_\_12 Release  
[winmail.dat](#)  
[message\\_body.rtf](#)

Hello Jim,

Can you please release the Passat 3.6L VID 411\_10206\_12 so we can pick it up on Monday morning.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com) <<mailto:william.rodgers@vw.com>>

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 5/20/2011 3:26:30 PM  
**Subject:** RE: VW Group - VID 411\_10206\_\_12 Release  
<mailto:william.rodgers@vw.com>

Thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, May 20, 2011 11:15 AM  
To: Rodgers, William  
Subject: Re: VW Group - VID 411\_10206\_\_12 Release

Because the correlation between manufacturer's data and our initial test was so close, I don't want to use lab resources retesting the vehicle to get validated NOx results. We will use manufacturer's data as official results.

I released VID 411\_10206\_\_12. I noticed its already parked in the lot out front ready for pickup.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)>, "Giles, Michael" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>, "Rhodes, Brian" <[Brian.Rhodes@vw.com](mailto:Brian.Rhodes@vw.com)>  
Date: 05/20/2011 08:01 AM  
Subject: VW Group - VID 411\_10206\_\_12 Release



Hello Jim,

Can you please release the Passat 3.6L VID 411\_10206\_12 so we can pick it up on Monday morning.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com) <<mailto:william.rodgers@vw.com>>

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[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Fri 5/20/2011 8:05:52 PM  
**Subject:** VW Group - VW Touareg Certificate Request - Test Group CVWXT03.6U76

Hi Jim,

Today we uploaded application docs and made a cert. request for CVWXT03.6U76 (VW Touareg).

Please let me know if there are any questions on this request.

Best regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kissling, Karlheinz (N/EA-521)" [Karlheinz.Kissling@AUDI.DE]; Hart, Robert (VWoA) [Robert.Hart@vw.com]; Schuetze, Michael (N/EA-521)" [Michael.Schuetze@audi.de]  
**From:** "Rodgers, William"  
**Sent:** Mon 5/23/2011 11:36:07 AM  
**Subject:** FW: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated  
[winmail.dat](#)  
[message\\_body.rtf](#)  
[image001.gif](#)

Hi Jim,

Just a reminder, we have the following Audi TTRS coming over to you today that requires the use of a new manual shift schedule.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Rodgers, William  
Sent: Tuesday, May 10, 2011 7:42 AM  
To: Snyder, Jim  
Cc: Hart, Robert (VWoA); Giles, Michael; Kissling, Karlheinz (N/EA-521)  
Subject: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated

Hello Jim,

We have updated the Supplemental Information for the follow vehicle to include all new manual transmission shift schedules. This vehicle is schedule for confirmatory testing no May 25th. Please be sure your lab receives this new information prior to testing.

From:

Verify Administrator

Subject:

Supplemental Information received

Date:

Tue 5/10/2011 7:31 AM

Your recent Supplemental Information submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1

Accepted Datasets: 1

Rejected Datasets: 0

---

Vehicle ID: C3UK-AMQ

Vehicle Configuration #: 0

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 5/23/2011 1:32:18 PM  
**Subject:** VW Group - VID C3UG-TAQ Confirmatory prep  
[winmail.dat](#)  
[message\\_body.rtf](#)

Hello Jim,

Our factory engineers have requested to be present when your lab starts the prep cycle for the above Audi Q7 diesel confirmatory vehicle. The engineers who will be present are: Mr. Karlheinz Kissling, Mr. Michael Schuetze and Mr. Sandro Olt.

Please let me know the time/day they should be available in the manufacturers room, Or if this request cannot be fulfilled.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com) <<mailto:william.rodgers@vw.com>>

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 5/23/2011 2:05:16 PM  
**Subject:** RE: VW Group - VID C3UG-TAQ Confirmatory prep  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:william.rodgers@vw.com>

Thanks Jim.

Keep me advised of the latest.

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, May 23, 2011 9:56 AM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Re: VW Group - VID C3UG-TAQ Confirmatory prep

Thanks for the heads up. Latest word from the lab is that they can test Diesels starting Thursday so prep would be Wednesday. I don't yet have confirmation that they are planning to run both diesels that day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>

To: Jim Snyder/AA/USEPA/US@EPA

Date: 05/23/2011 09:32 AM

Subject: VW Group - VID C3UG-TAQ Confirmatory prep

Hello Jim,

Our factory engineers have requested to be present when your lab starts the prep cycle for the above Audi Q7 diesel confirmatory vehicle. The engineers who will be present are: Mr. Karlheinz Kissling, Mr. Michael Schuetze and Mr. Sandro Olt.

Please let me know the time/day they should be available in the manufacturers room, Or if this request cannot be fulfilled.

Thanks,

Bill Rodgers

Engineering and Environmental Office



VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

/ \_ \.  
(o\\_l\_/o)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 5/24/2011 2:13:35 PM  
**Subject:** VW Group - DI submission  
[winmail.dat](#)  
[message\\_body.rtf](#)

Jim,

Give me a call if you need more clarification after reading the Decision Information that I just submitted for test group CADXV04.23UH.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com) <<mailto:william.rodgers@vw.com>>

/ \_ \.  
(o\\_l\_/o)

**To:** "Verify Help Desk" [verifyhelp@csc.com]  
**Cc:** David Good/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 5/26/2011 11:46:47 AM  
**Subject:** 2012 Lamborghini Label Index #65  
[winmail.dat](#)  
[message\\_body.rtf](#)  
[20110526073341135.pdf](#)

Hello [Ex. 4 - CBI]

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Fri 5/27/2011 2:15:26 PM  
**Subject:** VW Group - Certificate Request in for CVWXV02.0U36

Hello Jim,

Today we submitted a request for certificate for test group CVWXV02.0U36 (VW Jetta). This test group is a carryover from BVWXV02.0MPI.

We experienced some delay before getting the OBD approval, so our timing is rather tight. Any help you could provide from your end is greatly appreciated.

Best regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA[]; Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Tue 5/31/2011 10:37:39 AM  
**Subject:** FW: 2012 Lamborghini Label Index #65  
[winmail.dat](#)  
[message\\_body.rtf](#)  
[20110526073341135.pdf](#)

Hello Jim;

As you can see from the mail below and the Verify help desk response, the EPA will have to repair the EPA confirmatory test to eliminate the bag 1 results from the test (#9ADX09010216). This new rule, that has affected most of our SC03 and Highway tests, does not permit a value to be entered in Bag 1. We had to fix several manufacture tests in order for the 2012 labels to be accepted into Verify. We are unable or permitted to change the data in an EPA test. Could you please investigate and let me know the outcome?

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

-----Original Message-----

From: [REDACTED] Ex. 6 [REDACTED]@csc.com] On Behalf Of Verify Help Desk  
Sent: Friday, May 27, 2011 3:34 PM  
To: Thomas, Richard (EEO)  
Subject: Re: 2012 Lamborghini Label Index #65

Richard,

The rule is new since last friday's deployment. You will have to refer a different test or discuss this with your EPA cert.

Ex. 6

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the  
Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard

(EEO)"

<Richard.Thomas@v

To

w.com>

Verify Help Desk@CSC

cc

05/26/2011 07:46 <Good.David@epamail.epa.gov>,

AM

<snyder.jim@epa.gov>

Subject

2012 Lamborghini Label Index #65

Hello Ex. 6

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for

correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

(See attached file: 20110526073341135.pdf)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Glas, Tobias (EASZ/1)" [tobias.glas@volkswagen.de]; Glas, Tobias (EASZ/1)" [tobias.glas@volkswagen.de]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 5/31/2011 7:14:12 PM  
**Subject:** RE: 411 10208-12\_5-26-11 Laboratory Test Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Volkswagen has decided to accept the US06 and Highway tests for this vehicle.

We would like to request that the FTP rerun take place this week. Please let me know as soon as you have a test date/time scheduled.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)



From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, May 31, 2011 9:54 AM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Fw: 411 10208-12\_5-26-11 Laboratory Test Data

Here's the Diesel Passat data. The FTP data was voided due to CH4 span check and will have to be rerun. Let me if VW accepts the US06 and Hwy.

I haven't seen any of the recent tests in Verify yet but hopefully we will later this morning.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/31/2011 09:46 AM -----

From: Vincent Mazaitis/AA/USEPA/US  
  
To: Jim Snyder/AA/USEPA/US@EPA  
  
Date: 05/31/2011 08:16 AM  
  
Subject: 411 10208-12\_5-26-11 Laboratory Test Data

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com];  
Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Schuetze, Michael (N/EA-521)"  
[Michael.Schuetze@audi.de]  
**From:** "Rodgers, William"  
**Sent:** Tue 5/31/2011 7:29:05 PM  
**Subject:** RE: Audi Q7 data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, May 26, 2011 5:16 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Audi Q7 data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 6/1/2011 11:34:40 AM  
**Subject:** RE: Audi Q7 data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>

Ok thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, May 31, 2011 4:45 PM  
To: Rodgers, William  
Cc: Schuetze, Michael (N/EA-521); Hart, Robert (VWoA); Mazaitis.Vincent@epamail.epa.gov  
Subject: RE: Audi Q7 data

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From:  
"Rodgers, William" <William.Rodgers@vw.com>  
  
To:  
Jim Snyder/AA/USEPA/US@EPA  
  
Cc:  
Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>,  
"Schuetze, Michael (N/EA-521)" <Michael.Schuetze@audi.de>  
  
Date:  
05/31/2011 03:30 PM  
  
Subject:  
RE: Audi Q7 data

Hello Jim,  
Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

/ \_ \.  
(o\\_l\\_o)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, May 26, 2011 5:16 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Audi Q7 data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 6/1/2011 1:27:20 PM  
**Subject:** RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Thanks for trying.

Please remind the lab to put it on a battery charger once it comes inside as discussed.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 01, 2011 9:20 AM  
To: Rodgers, William  
Subject: Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From: VerifyAdministrator@verify-as1.epa.gov  
To: Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
Date: 06/01/2011 09:15 AM  
Subject: Confirmatory Test Date assigned for (411 10208 /12 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date : 06/07/2011  
Manufacturer: VWX  
Vehicle ID: 411 10208 /12  
Vehicle Configuration: 0

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 6/1/2011 1:51:18 PM  
**Subject:** RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)  
<mailto:Snyder.Jim@epamail.epa.gov>

Cool thanks.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 01, 2011 9:50 AM  
To: Rodgers, William  
Subject: RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

I sent them a note about charging.

I think we'll see the Q7 data in Verify today.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From:  
"Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
  
To:  
Jim Snyder/AA/USEPA/US@EPA  
  
Date:  
06/01/2011 09:27 AM  
  
Subject:  
RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Thanks for trying.



Please remind the lab to put it on a battery charger once it comes inside as discussed.  
Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 01, 2011 9:20 AM  
To: Rodgers, William  
Subject: Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From:  
VerifyAdministrator@verify-as1.epa.gov  
  
To:  
Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
  
Date:  
06/01/2011 09:15 AM  
  
Subject:  
Confirmatory Test Date assigned for (411 10208 /12 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date : 06/07/2011  
Manufacturer: VWX  
Vehicle ID: 411 10208 /12  
Vehicle Configuration: 0

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 6/2/2011 1:25:20 PM  
**Subject:** RE: Audi Q7 data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>

Hi Jim,

Three of the four Q7 test results came through in Verify last night. It appears that the (89) US06 2-bag is MIA. Can you check on it or should I call the help desk?

Thanks, Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, May 31, 2011 4:45 PM  
To: Rodgers, William  
Cc: Schuetze, Michael (N/EA-521); Hart, Robert (VWoA); Mazaitis.Vincent@epamail.epa.gov  
Subject: RE: Audi Q7 data

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)>, "Schuetze, Michael (N/EA-521)" <[Michael.Schuetze@audi.de](mailto:Michael.Schuetze@audi.de)>  
Date: 05/31/2011 03:30 PM  
Subject: RE: Audi Q7 data

Hello Jim,  
Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

/ \_ \.  
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From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, May 26, 2011 5:16 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Audi Q7 data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** David Good/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA; [Ex. 7]@vw.com]; oberts French/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA; [Ex. 7] [Ex. 7]@vw.com]; inc Wehrly/AA/USEPA/US@EPA; [Ex. 7] [Ex. 7]@vw.com]; [Ex. 7]@vw.com]; [Ex. 7]@lamborghini.com]  
**From:** [Ex. 7]  
**Sent:** Thur 6/2/2011 4:00:27 PM  
**Subject:** Lamborghini Roadster Suppress from Fuel Economy Guide  
[winmail.dat](#)  
[message body.rtf](#)

Hello Dave;

Sorry about all the fuss about this Lamborghini model and the communication that EPA got from the Lamborghini agency. As you know our office labeled the Aventador Coupe and Aventador Roadster (carline 476) back in January with a release date of February 28th. This was all good at that time. Today we learned that the Aventador Roadster will most likely not be built during the 2012 production year, but more likely as the 2013 model year starts production. Since this 2012 Roadster model will most likely not be available, we request that it be suppressed or removed from the online fuel economy guide.

Once we get the litmus test issues from Verify resolved, as we are having trouble to enter new labels and correct already issued labels into Verify, I will change the release date of the Lamborghini Aventador Roadster, label index 06.

If you have any questions, please call me.

Best regards,

[Ex. 7]  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
[Ex. 7]  
**Ex. 7**



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 6/7/2011 11:07:24 AM  
**Subject:** RE: cert req

Jim,

Thanks for the heads up. Mike Giles will handle the resubmission this morning.

PS – the letter of explanation we owe you for the TTRS start up procedure is being reviewed by Ex. 7 so I hope to get that to you today.

Ex. 7

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, June 06, 2011 5:00 PM  
To: Ex. 7  
Subject: cert req

Ex. 7 this the cert request that you need to re-submit per my phone message. CVWXT03.6U76

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 6/7/2011 1:39:12 PM  
**Subject:** TTRS Start up procedure  
Vehicle Start Procedure for EPA - C3UK AMQ 2sec delay.doc  
william.rodgers@vw.com

Jim,

As discussed here is the updated start up procedure for the TTRS.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

/ \_ \.  
(o\\_l\_/o)

# Vehicle ID: C3UK – AMQ

## Starting Instructions:

- Place gearshift lever into “ NEUTRAL “
- Apply the parking brake (brake handle in center console)
- Press the clutch pedal to the very far end
- Turn ignition key to “Ignition On” position. Wait at least 2 seconds before starting the engine by turning ignition key to “Start” position. Thereafter release the key.

## Location of Fuel Tank Drain Hoses:

- Two rubber hoses to the right of the passenger seat (one rubber hose for each chamber of the saddle fuel tank).

## Location of Fuel Filler Door and Trunk Lid Release:

- Two buttons on the left door panel below the armrest with corresponding symbols

## Engine hood release:

- Lever on the A-pillar

## Traction Control:

- TCS is deactivated as well as Anti Lock Brake.  
No special button must be pushed.  
Please ignore all the Warning Lights and Symbols (TPMS, TCS, ABS, BRAKE) on the dashboard illuminated as a consequence of the conversion to front wheel drive as well as the potential warning buzzer.

## Gearshift Pattern:

- Regular 6-speed gearshift pattern with neutral position in shift lane 34.  
To go into reverse you have to push the gearshift lever down.

R	1	3	5
	2	4	6

## Fan Placement:

- Centered in front of the car



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 6/7/2011 2:27:59 PM  
**Subject:** RE:

Jim,

The cooling fan should be positioned slightly tilted upward to avoid air flow escaping under the car. This was previously done by your lab tech. at the request of Karlheinz.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 07, 2011 10:01 AM  
To: Rodgers, William  
Subject:

The Audi TTRS will run at 7 tomorrow morning.

There seems some confusion with fan position between the vehicle sheet and the representative. You might want to ask Carl Heinz what he wants on the TTRS. I don't remember if it was an issue on it or just the Q7.

I have the start sheet, thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 6/7/2011 7:04:30 PM  
**Subject:** VW Group - CVWXT03.6U76 Certificate Request

Hello Jim,

Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 6/8/2011 10:36:37 AM  
**Subject:** RE: FW: 2012 Lamborghini Label Index #65  
<mailto:Ex.6@csc.com>

That Bob really knows his stuff, doesn't he? We have one of those Bob types, here too.

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 07, 2011 2:41 PM  
To: Thomas, Richard (EEO)  
Subject: Re: FW: 2012 Lamborghini Label Index #65

I caught up with Bob , All test data will be re-loaded including EPA LOD data and even older data migrated from CEFEIS. So the C/O data should appear. Give it another day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 05/31/2011 06:39 AM  
Subject: FW: 2012 Lamborghini Label Index #65

Hello Jim;

As you can see from the mail below and the Verify help desk response, the EPA will have to repair the EPA confirmatory test to eliminate the bag 1 results from the test (#9ADX09010216). This new rule, that has affected most of our SC03 and Highway tests, does not permit a value to be entered in Bag 1. We had to fix several manufacture tests in order for the 2012 labels to be accepted into Verify. We are unable or permitted to change the data in an EPA test. Could you please investigate and let me know the outcome?

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

-----Original Message-----

From: [REDACTED] Ex. 6 [REDACTED]@csc.com] On Behalf Of Verify Help Desk  
Sent: Friday, May 27, 2011 3:34 PM  
To: Thomas, Richard (EEO)  
Subject: Re: 2012 Lamborghini Label Index #65

Richard,

The rule is new since last friday's deployment. You will have to refer a different test or discuss this with your EPA cert.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the  
Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard

(EEO)"

<Richard.Thomas@v

To

w.com> Verify Help Desk@CSC

cc

05/26/2011 07:46 <Good.David@epamail.epa.gov>,

AM <snyder.jim@epa.gov>

Subject

2012 Lamborghini Label Index #65

Hello **Ex. 6**

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213

Fax: 248 754-4207  
Richard.Thomas@VW.com

(See attached file: 20110526073341135.pdf)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US] [attachment "20110526073341135.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/8/2011 1:39:54 PM  
**Subject:** Re: VW Group - CVWXT03.6U76 Certificate Request

Okay, I finally remembered to delete the requests this morning. You can re-submit them and they should be fine.

The same problem that kept the STP composite calculated values from showing also effected the CSI data printouts in the Part One Application pdf files of the VW and 2 Audi applications that just denied. Those Part One pdf files will need to be revised with new CSI summaries printouts. I don't think you need to wait on re-submitting the Cert request over revising the pdf if you are running tight on the certificate timing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Giles, Michael" <michael.giles@vw.com>  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
**Date:** 06/07/2011 06:20 PM  
**Subject:** Re: VW Group - CVWXT03.6U76 Certificate Request

It looked okay. I approved it. I will deny the others and you can re-submit them.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Giles, Michael" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 06/07/2011 03:04 PM  
**Subject:** VW Group - CVWXT03.6U76 Certificate Request

Hello Jim,

Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Wed 6/8/2011 6:05:29 PM  
**Subject:** VW Group - Certificate Request CVWXV02.0U36

Hi Jim,

Thanks for the note. I re-submitted test group information for CVWXV02.0U36 as well as the certificate request. I will update the application CSI later this week.

- Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 08, 2011 9:40 AM  
To: Snyder.Jim@epamail.epa.gov  
Cc: Giles, Michael; Hart, Robert (VWoA); Rodgers, William  
Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

Okay, I finally remembered to delete the requests this morning. You can re-submit them and they should be fine.

The same problem that kept the STP composite calculated values from showing also effected the CSI data printouts in the Part One Application pdf files of the VW and 2 Audi applications that just denied. Those Part One pdf files will need to be revised with new CSI summaries printouts. I don't think you need to wait on re-submitting the Cert request over revising the pdf if you are running tight on the certificate timing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Giles, Michael" <michael.giles@vw.com>

Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 06/07/2011 06:20 PM  
Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

It looked okay. I approved it. I will deny the others and you can re-submit them.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 06/07/2011 03:04 PM  
Subject: VW Group - CVWXT03.6U76 Certificate Request

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Thanks,  
Mike

Michael Giles  
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Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 6/8/2011 6:45:50 PM  
**Subject:** RE: VW Group - Certificate Request Denials

Jim,

The revised applications and new certificate requests have been processed.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 08, 2011 9:40 AM  
To: Snyder.Jim@epamail.epa.gov  
Cc: Giles, Michael; Hart, Robert (VWoA); Rodgers, William  
Subject: Re: VW Group - CVWXT03.6U76 Certificate Request

Okay, I finally remembered to delete the requests this morning. You can re-submit them and they should be fine.

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From: Jim Snyder/AA/USEPA/US  
To: "Giles, Michael" <michael.giles@vw.com>  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>

Date:

06/07/2011 06:20 PM

Subject:

Re: VW Group - CVWXT03.6U76 Certificate Request

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Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:

"Giles, Michael" <michael.giles@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Cc:

"Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>

Date:

06/07/2011 03:04 PM

Subject:

VW Group - CVWXT03.6U76 Certificate Request

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Michael Giles  
Certification Specialist  
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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** william.rodgers@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/9/2011 11:31:03 AM  
**Subject:** C3UK-AMQ 6-8-2011  
[C3UK-AMQ\\_6-8-2011.pdf](#)

Good morning Bill,

As per our phone conversation this morning, please find enclosed the Laboratory Test Data for the Subject vehicle.

If you have any questions, please let Jim or me know.

Thanks,

Vince Mazaitis

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-026

Vehicle ID: C3UK-AMQ

## Test Information



Test Date: 6/8/2011

MFR Name: AUDI

Key Start / Hot Soak: 08:31:59 / 10:01

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: MANUAL

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Shift Schedule: A06400022

Calculation Method: Gasoline

Beginning Odometer: 004380.0 MI

Pretest Remarks:

Drive Schedule: ftp3bag

Soak Period: 17.5 hours

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	8.005	40.692	1.872	1.089	2.566	
Ambient	2.238	0.357	0.014	0.047	2.063	
Net Concentration	5.950	40.384	1.859	1.045	0.671	5.221

Remarks:

### Phase 2

Sample	2.626	1.459	0.266	0.736	1.948	
Ambient	2.233	0.044	0.010	0.047	2.071	
Net Concentration	0.515	1.417	0.257	0.692	-0.009	0.515

Remarks:

### Phase 3

Sample	2.606	10.902	0.158	0.935	2.118	
Ambient	2.278	0.034	0.007	0.046	2.060	
Net Concentration	0.487	10.870	0.152	0.892	0.202	0.267

Remarks:

### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks: This test has particulate results.

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.076	1.044	0.074	424.9	0.010	0.067 / 0.070	20.915
Phase 2	0.011	0.058	0.016	447.7	0.000	0.011 / 0.011	19.933
Phase 3	0.006	0.280	0.006	361.9	0.003	0.003 / 0.004	24.634
Weighted	0.02296	0.32383	0.02550	419.353	0.00288	(NMOG=1.04xNMHC) 0.0203 / 0.0211	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #: D329 - FWD
Phase 1	20.87		Inertia: 3750
Phase 2	19.89		EPA Set Co A: 12.52
Phase 3	24.58		EPA Set Co B: 0.0882
			EPA Set Co C: 0.02124
Weighted	21.22		Emiss-Bench: Mexa 7200dle

v101208 - d329 EPAVDAEm110608074621

Page 1 of 2

Print Time 08-Jun-2011 13:51



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-026

Vehicle ID: C3UK-AMQ

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.274	3.751	0.267	1526.7	0.036	0.240	1.087
Phase 2	0.041	0.225	0.063	1726.0	0.000	0.041	
Phase 3	0.022	1.007	0.022	1298.9	0.011	0.012	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.95	28.95	28.95	
Avg Cell Temp (degF)	74.42	75.10	75.27	
Dew Point (degF)	52.63	52.75	52.68	
Specific Humidity (grains/lbm)	61.10	61.38	61.22	
NOx Corr Factor	0.9387	0.9398	0.9392	
CO2 Dilution Factor	12.253	18.199	14.311	
CFV Vmix (scf @68F)	2796.30	4777.34	2786.95	
Total Vmix (scf@68F)	2818.56	4815.67	2809.21	
CVS Flow Rate Avg (scfm)	331.12	329.51	330.01	
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	506.70	869.90	506.70	
Distance (miles)	3.593	3.856	3.589	
Bag Analysis Time (secs)	1003.8	247.3	140.1	

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0307	0.48	0.01	391	0	0.0258

Odometer  
4157 M

MPG  
22.7

MPG is 6.96 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7  
Fuel: 61 Tier 2 Cert Gasoline

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2011-0170-026		Vehicle ID: C3UK-AMQ						
Test Date: 6/8/2011		MFR Name: AUDI						
Key Start: 08:31:59 / 10:01		MFR Codes: 640      ADX						
Fuel Container ID: F00023		Config #: 00						
Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: MANUAL						
Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa		Shift Schedule: A06400022						
Calculation Method: Gasoline		Beginning Odometer: 004380.0 MI						
Pretest Remarks:		Drive Schedule: ftp3bag						
		Soak Period: 17.5 hours						
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / ml	Filter comment
<b>Phase 1</b>								
	A	184001	136.3177	136.3688	0.05112	19.388	5.396	
	B	184002	137.6702	137.7220	0.05183	19.702	5.483	
	C	184007	135.3500	135.3956	0.04562	17.359	4.831	
Remarks:								
<b>Phase 2</b>								
	A	184211	138.4124	138.4445	0.03210	12.104	3.139	
	B	184212	137.8821	137.9097	0.02760	10.404	2.698	
	C	184213	135.4058	135.4336	0.02780	10.472	2.716	
Remarks:								
<b>Phase 3</b>								
	A	184348	139.3521	139.3779	0.02580	9.763	2.720	
	B	184349	138.6200	138.6453	0.02530	9.578	2.668	
	C	184398	137.1365	137.1618	0.02530	9.578	2.669	
Remarks:								
<b>Phase 4</b>								
Remarks: <u>This test has particulate results.</u>								
<b>Average Results</b>					Net Wt	Total Mass	Total Mass	
					mg	mg	mg / ml	
	Phase 1				0.04952	18.816	5.237	
	Phase 2				0.02917	10.993	2.851	
	Phase 3				0.02546	9.640	2.686	
All filter weights are corrected for buoyancy.								
Weighted All Filters:							3.30049	
<b>Reference Filter Stability Check</b>				Tare	Gross	Net Wt	Stability Check	Dyno #: D329 - FWD
2% of Avg Net or 0.01 mg				No.	(Pre Wt)	(Post Wt)	mg	PASS/FAIL
0.01				1	137.00886	137.00903	0.00017	PASS
				2	138.21750	138.21667	-0.00083	PASS
								Inertia: 3750
								EPA Set Co A: 12.52
								EPA Set Co B: 0.0882
								EPA Set Co C: 0.02124
Emissions Bench Mexa 7200dlc								
v101208 - d329 EPAVDAEm110608074621				Page 1 of 2		Print Time 08-Jun-2011 13:51		

**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-026

Vehicle ID: C3UK-AMQ

<b>WEIGHING CHAMBER</b>	<b>Buoyancy</b>	<b>Operator</b>	<b>Chamber Temp</b>	<b>Dew Point</b>	<b>Barometer</b>	<b>Last Change in Status</b>
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b> 6/7/11 14:57	1.0011096	022298	70.9	49.6	28.92	NORM @ 06/07/11 14:26:48
<b>Post-test</b> 6/8/11 12:36	1.0011101	022298	71	48.6	28.94	NORM @ 06/07/11 14:26:48

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.95	28.95	28.95	
Avg Cell Temp (degF)	74.42	75.10	75.27	
Dew Point (degF)	52.63	52.75	52.68	
Specific Humidity (grains/lbm)	61.10	61.38	61.22	
NOx Corr Factor	0.9387	0.9398	0.9392	
Dilution Factor	12.25	18.20	14.31	
CFV Vmix (scf @68F)	2796.30	4777.34	2786.95	
Sample Volume A (scf @68F)	7.432	12.773	7.423	
Sample Volume B (scf @68F)	7.414	12.775	7.419	
Sample Volume C (scf @68F)	7.407	12.784	7.419	
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	7.418	12.777	7.420	
Total Vmix (scf @68F)	2818.56	4815.67	2809.21	
Phase Time (sec)	506.70	869.90	506.70	
Distance (miles)	3.593	3.856	3.589	
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	42.0	41.7	41.7	
PSU Dil Air B (degC)	44.4	43.9	43.8	
PSU Dil Air C (degC)	40.8	40.6	40.5	
PSU Filter A (degC)	44.1	45.5	45.6	
PSU Filter B (degC)	47.2	47.0	45.7	
PSU Filter C (degC)	44.3	44.8	44.4	
PSU Dil Flow A (lpm)	29.9	29.9	29.9	
PSU Dil Flow B (lpm)	29.9	29.9	29.9	
PSU Dil Flow C (lpm)	30.0	29.9	29.8	
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/9/2011 2:20:18 PM  
**Subject:** NHTSA footprint measurement procedure attached  
[NHTSA footprint TP-537-01.pdf](#)

Richard,

Regarding base tires, see page 17, parag G. [I'm not sure what NHTSA does if they can't find a vehicle equipped with the base tires.]

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 6/9/2011 7:18:09 PM  
**Subject:** Vehicle releases  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Please release the VW Passat and Audi TTRS test vehicles. We hope to pick them up on Friday (tomorrow) and/or Monday.

The Verify results came in today for the TTRS.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** verifyhelp@csc.com[verifyhelp@csc.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Thur 6/9/2011 8:07:18 PM  
**Subject:** Found yet another glitch in the new Verify System release.  
[LightDutyCertificationDataSubmission.xml](#)

Problem: For diesels the EPA performs two US06 tests (A one bag test as the Confirmatory Test for certification with PM measurement and one as a two bag test for fuel economy without PM measurement.). The PM is needed for the PM Comp calculation and the two bag test is needed for the Litmus Test for fuel economy.

The problem is you get the error message below for the US06 test number entered in the Litmus Test section when the required two bag test (w/o PM measurement) number is entered. PM is not required for the Litmus Test, so this business rule should not apply to the Litmus test entries.

I have submitted Test Group Info xml files with all combinations of the US06 test numbers. I get back either the error message below or the a CSI file with N/A in the Litmus Test fields. Neither is acceptable.

- Submission
  - o Document Name: LightDutyCertificationDataSubmission.xml
  - o Transaction Id: \_cbff36da-9b4c-46be-970c-380911f2f633
  - o Date Originally Submitted: 06/09/2011

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-CERT-TG-BR080b - If the SFTP Compliance Indicator (TG-216.8) is 'Y' (Yes) and there is an exhaust emission standard entered with the emission name (TG-209) of PM-COMP (PM SFTP Composite), then the US06 test number (TG-218) must identify a test that has a PM emission result (TI-19). (Test Number: CVWX91000952 Emission Results Found: [HC-TOTAL, NOX, NMOG, HC-NM+NOX, FE BAG 2, HC-NM, CO2, CO, METHANE, FE BAG 1, MFR FE])

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=David Bochenek/OU=AA/O=USEPA/C=US@EPA;CN=David Vanamburg/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=John Spieth/OU=AA/O=USEPA/C=US@EPA[]; N=David Vanamburg/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=John Spieth/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=John Spieth/OU=AA/O=USEPA/C=US@EPA[]; N=John Spieth/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/19/2012 2:47:04 PM  
**Subject:** Re: VW testing schedule

Hello Mike,

Site 329 is currently not available for any diesel testing, not just particulates as I indicated to your Engineers. Sorry for the confusion. It is likely that VW324 10220/13 will not test today. I'll keep you informed of the status of the site.

361 730 136/13 did test, and is currently in the Hot Soak SHED. Your Engineers asked to let them know if the start - stop function worked properly. I checked with the vehicle tester and it worked properly. We do need the nominal voltage for this vehicle for next week's four bag test.

Again, if you have any questions or concerns, please contact me.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/17/2012 12:10 PM  
Subject: VW testing schedule

Hello Vincent,

To follow up from my voice message – would you be able to send a schedule for the testing for our Jetta Hybrid and Beetle TDI? We would like to have 2 or 3 staff there for the start of testing if possible.

Also, we have a new colleague here from Germany, and we would like to request a small tour of your facility (maybe after one of the tests if this works for you).



Please let me know or feel free to call me if you wish to discuss.

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/20/2012 1:09:45 PM  
**Subject:** RE: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len,

The meeting is still scheduled for 1 pm and Jim and Joel are here today.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*  
This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.  
\*\*\*\*\*

**From:** "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA, Joel Dalton/AA/USEPA/US@EPA  
**Cc:** "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)" <hannah.schlueter@volkswagen.de>  
**Date:** 09/20/2012 08:56 AM  
**Subject:** RE: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Hello all:

I have tried to reach Jim and Joel and left messages with each. I would like to verify the status of this meeting scheduled for today. If necessary, we can delay until tomorrow.

Please let me know since I would require about 1 hour+ travel time to Ann Arbor.

Regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, September 17, 2012 10:58 AM  
To: Wright.DavidA@epamail.epa.gov; Dalton.Joel@epamail.epa.gov; Kata, Leonard (EEO)  
Subject: Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len there is a slight chance that I won't be back by thursday for this mtg but I will be in Friday. In case there is a change, Dave's number is 214-4467 and Len's number is 248-754-4204.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/20/2012 5:56:04 PM  
**Subject:** re: 2013 FE Guide - Minors Errors to correct in Verify; correcting them will save my review time (every time I run the FE Guide query)  
[VW Group 2013 FEGuide-all rel dates-no-sales-9-17-2012.xlsx](#)

Richard,

Enclosed are the data in EPA's Verify data base as of September 17, 2012.

Please correct the errors in the Indexes which are highlighted in green fill in the first few columns. While these errors are minor and did not hold up posting the data on [www.fueleconomy.gov](http://www.fueleconomy.gov), they will save me a few minutes of my review time each time I run the 2013 FE Guide query (every two weeks or more frequently).

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Thur 9/20/2012 8:36:03 PM  
**Subject:** Tentative: RE: Audi Meeting with EPA

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 9/20/2012 9:51:37 PM  
**Subject:** Accepted: FW: Information Update - Room has changed: RE: Audi Meeting with EPA  
[winmail.dat](#)  
[message\\_body.rtf](#)

Jim:

I will confirm a count from our side ASAP.

Thanks,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

Jim:

I will confirm a count from our side ASAP.

Thanks,



**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 9/21/2012 12:19:36 PM  
**Subject:** FW: VW Group - Test Update

Hi Jim,

Just a follow up to my voicemail; Can you provide an update for us this sometime this morning? Please see my comments to Vince below.

From: Giles, Michael (EEO)  
Sent: Thursday, September 20, 2012 10:39 AM  
To: Vincent Mazaitis (Mazaitis.Vincent@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group - Test Update

Hi Vince,

Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.

Lastly, we are requesting any update you can provide on the Beetle TDI test situation.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road



Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** DavidA Wright/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;William Ott/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; illiam Ott/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; hris Nevers/AA/USEPA/US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 9/21/2012 5:10:37 PM  
**Subject:** RE: Request for US06 Drive Trace  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[image001.gif](#)

Hello David,

I understand that you spoke with Len Kata about this yesterday, but just as a follow up:

- Currently, the labs record only 1 hz data .
- 10 hz data logging should be possible for the future. We have communicated the need for 10 hz data to our factories.

Please let us know if there are any other specific requirements related to this issue.

Regards,

Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, September 12, 2012 8:34 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder; William Ott; Chris Nevers  
Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\*

"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/05/2012 08:36 AM  
Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\*

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\* [attachment

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[];  
N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/24/2012 11:26:47 AM  
**Subject:** Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/20/2012 10:39 AM  
Subject: VW Group - Test Update

Hi Vince,

Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.

Lastly, we are requesting any update you can provide on the Beetle TDI test situation.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA; DavidA Wright/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 9/24/2012 12:24:07 PM  
**Subject:** RE: VW Group - Test Update  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Vince.

We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.

Regards,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, September 24, 2012 7:27 AM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO); Jim Snyder; DavidA Wright  
Subject: Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>



To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/20/2012 10:39 AM  
Subject: VW Group - Test Update

Hi Vince,

Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.

Lastly, we are requesting any update you can provide on the Beetle TDI test situation.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 9/24/2012 3:11:09 PM  
**Subject:** VW Group - Supplemental Information VID D3UG-DAQ-1

Hello Jim,

We have submitted the Supplemental Information for confirmatory testing of the Audi A8 TDI diesel, VID D3UG-DAQ-1. We are hoping to schedule a delivery date of October 22 with testing on Oct 24th.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/24/2012 6:43:10 PM  
**Subject:** RE: VW Group - Test Update  
[361 730 136-13 9-19-12.pdf](#)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hello Mike,

Please find enclosed the FTP and Evap Laboratory Test Results for 361 730 136/13 Config 00.

I'm not sure when the 4bag FTP-Hwy-US06 are scheduled. I'll let you know as soon as I find out.

If you have any questions or concerns, please contact me.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA  
Date: 09/24/2012 08:31 AM  
Subject: RE: VW Group - Test Update

Thanks Vince.

We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.

Regards,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Monday, September 24, 2012 7:27 AM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO); Jim Snyder; David A Wright  
Subject: Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/20/2012 10:39 AM  
Subject: VW Group - Test Update

Hi Vince,

Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.

Lastly, we are requesting any update you can provide on the Beetle TDI test situation.

Thanks,

Mike

Michael Giles

Certification Specialist

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Auburn Hills, MI 48326

United States of America

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FAX +1-248-754-4207

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0257-015				Vehicle ID: 361 730 136/13			
	Test Date: 9/19/2012			MFR Name: VOLKSWAGEN			
	Key Start / Hot Soak: 09:55:29 / 09:46			MFR Codes: 590			VWX
	Fuel Container ID: F00023			Config #: 00			
	Fuel Type: 61 Tier 2 Cert Test Fuel			Transmission: AUTO			
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa			Shift Schedule: A09980005			
	Calculation Method: Gasoline			Beginning Odometer: 009437.0 KM			
Pretest Remarks:				Drive Schedule: ftp3bag			
				Soak Period: 22.5 hours			
<b>Bag Data</b>							
	HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	5.411	21.139	1.449	0.792	2.384		
Ambient	3.157	3.287	0.028	0.047	2.022		
Net Concentration	2.441	18.047	1.423	0.748	0.482	1.912	
Remarks:							
<b>Phase 2</b>							
Sample	2.751	1.987	0.040	0.308	2.002		
Ambient	2.764	1.150	0.013	0.044	1.989		
Net Concentration	0.051	0.863	0.027	0.265	0.059	-0.014	
Remarks:							
<b>Phase 3</b>							
Sample	2.820	9.411	0.136	0.655	2.120		
Ambient	2.566	0.532	0.000	0.043	1.971		
Net Concentration	0.380	8.904	0.136	0.615	0.245	0.110	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: This test has SHED results. SHED Test Number = 2012-0257-015							
<b>Results</b>							
	HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.023	0.345	0.041	224.9	0.005	0.018 / 0.019	39.679
Phase 2	0.001	0.026	0.001	126.8	0.001	0.000 / 0.000	70.538
Phase 3	0.004	0.170	0.004	184.2	0.003	0.001 / 0.001	48.510
Weighted	0.00618	0.13201	0.01015	162.940	0.00237	(NMOG=1.04xNMHC) 0.0040 / 0.0042	
<b>Fuel Economy</b>							
	Gasoline MPG				Dyno Settings		
Phase 1	39.59				Dyno #: D002		
Phase 2	70.38				Inertia: 3625		
Phase 3	48.40				EPA Set Co A: 7.3499999		
					EPA Set Co B: 0.0141		
					EPA Set Co C: 0.01545		
Weighted	54.69				Emiss-Bench: D002		

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0257-015

Vehicle ID: 361 730 136/13

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.098
Phase 1	0.083	1.239	0.146	806.6	0.019	0.065	
Phase 2	0.003	0.101	0.005	488.0	0.004	0.000	
Phase 3	0.013	0.610	0.014	661.9	0.010	0.004	



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.13	29.15	29.16	
Avg Cell Temp (degF)	75.03	75.22	75.27	
Dew Point (degF)	49.39	49.52	49.08	
Specific Humidity (grains/lbm)	53.75	53.98	53.08	
NOx Corr Factor	0.9092	0.9101	0.9066	
CO2 Dilution Factor	16.860	43.478	20.411	
CFV Vmix (scf @68F)	2082.25	3558.99	2078.86	
CVS Flow Rate Avg (scfm)	245.40	245.39	245.49	
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	509.10	870.20	508.10	
Distance (miles)	3.587	3.848	3.594	
Bag Analysis Time (secs)	76.9	74.1	75.6	

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.007	0.178	0.0061	155	0	0.0046

Odometer  
9082 K

MPG  
57.2


MPG is 4.59 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

**Variable Temperature SHED Report****Test: 72 °F - 96 °F for 48 Hours****Test No: 2012-0257-014****Mfr: 00590 VID: 361 730 136/13 Config: 00**

Test Purpose	1	VTSHED# - Net Vol	PZ1 - 58.819 m <sup>3</sup>
Test Procedure	23	Cert Flag	Y
Fuel Type	61 Tier 2 Cert Test Fue	Requester	Jim Snyder
Technician Name	20511	Validators Initials	

**DIURNAL AND TOTAL EVAPORATIVE EMISSIONS**

Started (D@T)	09/20/2012 @ 05:22	Finished (D@T)	09/22/2012 @ 05:23
Start Temp (°F)	72.00	Test Length (hrs)	48
Day 1 Total (gHC)	0.114642	Diurnal (gHC)	0.115434
Day 2 Total (gHC)	0.115434	Hot_Soak_HC_(g)	0.007948
Day 3 Total (gHC)	0	Total Emissions (gHC)	<b>0.123382</b>

**QUALITY CONTROL CHECKS**

- ☒ 1. Was the Vehicle Soak-Time greater than or equal to 6?  
The Vehicle Soak-Time was 06:01:41.
- ☒ 2. Was the Vehicle Soak-Temperature during the final 6 hours 72 +/-3 °F?  
The largest Vehicle Soak-Temperature deviation during the final 6 hours was 71.82 °F.
- ☒ 3. Was the Time-Difference between closing & sealing the SHED 0 +/-5 min?  
The Time-Difference between closing & sealing the SHED was 0.00 min.
- ☒ 4. Was the SHED Feedback minus Setpoint Temperature (Underbody) 0 +/-3 °F?  
The difference was 1.44 °F.
- ☒ 5. Was the Average of SHED Feedback minus SHED Setpoint Temperature 0 +/-2 °F?  
The difference was 0.23 °F.
- ☒ 6. Was the Average Left & Right Sidewall minus SHED Setpoint Temperature 0 +/-5 °F?  
The difference was 1.49 °F.
- ☒ 7. Was the Cold-Water-In-Temp greater than or equal to 40 °F?  
The Minimum Cold-Water-In-Temp was 61.95 °F.
- ☒ 8. Was the Inside versus Outside Differential Pressure 0 +/-2 inH?  
The Differential-Pressure at its largest deviation was 0.40 inH.
- ☒ 9. Was the 1-day HC-Value taken at 1440 +/-6 min?  
The 1-day HC-Value was taken at 1440.05 min.
- ☒ 10. Was the 2-day HC-Value taken at 2880 +/-6 min?  
The 2-day HC-Value was taken at 2880.17 min.

FTP TID: 015 - Hot Soak TID: 015 - VERIFY Status: Unknown

**QC Note: All Automated Quality Checks Passed**



**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** DavidA Wright/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA; "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 9/24/2012 7:11:51 PM  
**Subject:** RE: VW Group - Test Update  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Vince,

We had indirect word from Ben that preconditioning was to be tomorrow and testing Wednesday. But if you hear anything different please let us know.

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, September 24, 2012 2:43 PM  
To: Giles, Michael (EEO)  
Cc: DavidA Wright; Jim Snyder; Rodgers, William (EEO)  
Subject: RE: VW Group - Test Update

Hello Mike,

Please find enclosed the FTP and Evap Laboratory Test Results for 361 730 136/13 Config 00.

I'm not sure when the 4bag FTP-Hwy-US06 are scheduled. I'll let you know as soon as I find out.

If you have any questions or concerns, please contact me.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA  
Date: 09/24/2012 08:31 AM  
Subject: RE: VW Group - Test Update

Thanks Vince.

We would appreciate it if you could forward the results as soon as they are available. Also, we are interested in the planned exhaust testing schedule for this week.

Regards,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, September 24, 2012 7:27 AM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO); Jim Snyder; DavidA Wright  
Subject: Re: VW Group - Test Update

Hello Mike,

I talked with the lab this morning, and for vehicle # 361 730 136/13 (Hybrid), we are awaiting post test processing including QC. I'll forward that data as soon as I receive it.

We are awaiting the o.k. for diesel testing for VW324 10220/13. I'll find out more about testing later this morning.

If you have any questions or concerns, please contact me.

Thanks for your patience Mike.

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/20/2012 10:39 AM  
Subject: VW Group - Test Update

Hi Vince,

Would you be able to send us any preliminary results for the Jetta Hybrid test? Also, if you could send us an rough idea of the test plan over the next days it would be great.

Lastly, we are requesting any update you can provide on the Beetle TDI test situation.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 9/25/2012 12:11:59 PM  
**Subject:** VW Testing

Hi Jim,

Just as a heads up, as I mentioned in my voice message this morning, our colleagues (Juergen Peter and Hannah Schlueter) are interested in a quick meeting with you sometime today if you are available for 20 minutes or so. They had suggested 1:00 or 1:30 timeframe. He mentioned that he would like to be here for the Start of Exhaust testing for the Hybrid and also discuss any new information you might have about the Beetle testing.

Michael Giles

Certification Specialist

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 9/25/2012 2:08:52 PM  
**Subject:** RE: VW Testing

Hi Jim,

I just spoke with Juergen, he is still interested in a quick visit around 1:00. As you suggested, I told him to go to the office side of EPA.

Thanks

Mike

From: Giles, Michael (EEO)  
Sent: Tuesday, September 25, 2012 8:12 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Subject: VW Testing

Hi Jim,

Just as a heads up, as I mentioned in my voice message this morning, our colleagues (Juergen Peter and Hannah Schlueter) are interested in a quick meeting with you sometime today if you are available for 20 minutes or so. They had suggested 1:00 or 1:30 timeframe. He mentioned that he would like to be here for the Start of Exhaust testing for the Hybrid and also discuss any new information you might have about the Beetle testing.

Michael Giles

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United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 9/25/2012 2:15:38 PM  
**Subject:** VW Schedule - Wednesday

Hi Vince,

Ben told us yesterday that the Jetta Hybrid exhaust tests are scheduled for Wednesday - can you confirm? Also is 7:00 am still the best time to show up?

As a second item, I spoke with Jim who mentioned that there has been progress with the diesel test lab, and that the Beetle might be tested sometime this week. If you could keep us advised of tentative or actual timing as it develops it would be greatly appreciated.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/25/2012 2:55:47 PM  
**Subject:** Re: VW Schedule - Wednesday

Hello Mike,

Just to follow up, We are still slated to test the Jetta Hybrid on Wednesday. Having your people here at 7:00 am is best. If there is a change, I'll call you.

The lab is currently testing the diesel tunnel. Hopefully it will come on line soon. Again, I'll keep you informed as to its status.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 09/25/2012 10:15 AM  
Subject: VW Schedule - Wednesday

Hi Vince,

Ben told us yesterday that the Jetta Hybrid exhaust tests are scheduled for Wednesday - can you confirm? Also is 7:00 am still the best time to show up?

As a second item, I spoke with Jim who mentioned that there has been progress with the diesel test lab, and that the Beetle might be tested sometime this week. If you could keep us advised of tentative or actual timing as it develops it would be greatly appreciated.

Thanks,

Mike

Michael Giles



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United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Wed 9/26/2012 11:42:55 PM  
**Subject:** Tentative: Audi Mtg w/ EPA rm 601C

**To:** DavidA Wright/AA/USEPA/US@EPA[]  
**Cc:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 9/27/2012 12:54:34 PM  
**Subject:** VW Group - Friday Beetle Test Visit  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[image001.gif](#)

Hello David,

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks,

Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, September 12, 2012 8:34 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder; William Ott; Chris Nevers  
Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\*

"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/05/2012 08:36 AM  
Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace

Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace

Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

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\*\*\*\*\* [attachment

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 9/27/2012 2:48:47 PM  
**Subject:** VW Group - Hybrid

Hi Jim,

Please do not release the Hybrid yet. There is discussion about requesting a retest. We will let you know.

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/27/2012 6:06:37 PM  
**Subject:** Re: VW Group - Friday Beetle Test Visit  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
(embedded image)  
(embedded image)

Yes I will be in the office tomorrow morning at 7 am. If you cannot reach me when you arrive, you can also ask to see David VanAmburg. Let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** DavidA Wright/AA/USEPA/US@EPA  
**Cc:** "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)" <hannah.schlueter@volkswagen.de>, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 09/27/2012 08:54 AM  
**Subject:** VW Group - Friday Beetle Test Visit

Hello David,

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks,



Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, September 12, 2012 8:34 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder; William Ott; Chris Nevers  
Subject: RE: Request for US06 Drive Trace

Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
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"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/05/2012 08:36 AM  
Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace  
Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
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Ann Arbor, Michigan 48105  
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\*\*\*\*\*

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM

To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace  
Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\* [attachment

"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 9/27/2012 10:35:10 PM  
**Subject:** Volkswagen Alternate Canister Loading Procedure  
Canister Loading Procedure.pdf

Hello Jim:

Attached is an advance copy of our formal request for approval of the Volkswagen alternate canister loading procedure. This was the subject of our meeting on September 20, 2012. I will also submit an electronic version ASAP.

Thanks again for meeting with us.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovation Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Dr.  
Ann Arbor, Michigan 48105

Leonard W. Kata Name  
Senior Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com) E-Mail

September 27, 2012 Date

Subject: Request for Use of Alternative Evaporative Canister Loading Procedure

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE 41 248 754 5000

Dear Jim:

On September 20, 2012, representatives from Volkswagen AG and Volkswagen Group of America, Inc., met with you and other EPA staff to request the use of an alternate carbon canister loading procedure. The proposed procedure is patterned after the procedure for off-vehicle charge capable hybrid electric vehicles with non-integrated refuelling canister-only systems, as described in the California Evaporative Emission Standards and Test Procedures for 2001 and Subsequent Model Motor Vehicles (amended March 22, 2012).

The request is described in the attached presentation material, which was provided to the agency at the September 20, 2012 meeting. The alternate procedure is intended for use on future model vehicles. This would be limited to conventional and hybrid vehicles that are equipped with non-integrated refueling emission control systems.

Please notify me if further clarification is required. I look forward to your response to this request.

Sincerely,  
VOLKSWAGEN GROUP OF AMERICA, INC.



Leonard W. Kata  
Senior Manager  
Engineering and Environmental Office

Enclosure

# Ex. 4 - CBI

# Ex. 4 - CBI

# Ex. 4 - CBI



# Ex. 4 - CBI

# Ex. 4 - CBI

# Ex. 4 - CBI

# Ex. 4 - CBI

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA]  
**From:** CN=DavidA Wright/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/1/2012 9:35:23 PM  
**Subject:** Re: NVFEL PDF Report Request for Beetle  
[2012\\_0240\\_003.pdf](#)  
[2012\\_0240\\_004.pdf](#)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[juergen.peter@volkswagen.de](mailto:juergen.peter@volkswagen.de)  
[hannah.schlueter@volkswagen.de](mailto:hannah.schlueter@volkswagen.de)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Wright.DavidA@epamail.epa.gov>  
(embedded image)  
(embedded image)  
(embedded image)  
(embedded image)  
(embedded image)

The attached files are copies of the FTP (2012\_0240\_004.pdf) and the HWFE (2012\_0240\_003.pdf).

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** DavidA Wright/AA/USEPA/US@EPA  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>,

"Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>  
Date: 10/01/2012 04:48 PM  
Subject: NVFEL PDF Report Request for Beetle

Hello David,

We now have VERIFY results for the Beetle. However, it would be very helpful if you could also send us a PDF version of the NVFEL reports, especially for the FTP test which contains bag by bag data for all components.

The test numbers are DVWX91001537 and DVWX91001538.

Thank you for your help,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Monday, October 01, 2012 8:38 AM  
To: Giles, Michael (EEO)  
Cc: Vincent Mazaitis  
Subject: Re: VW Group

Hi Mike,

We do not release preliminary data, once we have an official result we make sure are informed and able to review the complete results with your staff in Germany. I have a full schedule this afternoon and will be unable to meet with Juergen.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---10/01/2012 08:17:15 AM---Hello David, Just a quick note to reiterate our wish to review results for the Beetle as soon as pos

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 10/01/2012 08:17 AM

Subject: VW Group

Hello David,

Just a quick note to reiterate our wish to review results for the Beetle as soon as possible. The results must go back to Germany (+6 hours), hence our eagerness to see data.

Also, Juergen mentioned to me this morning that he was tentatively planning to a quick visit there around noon if you are available. Please keep us posted on status.

Thanks,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Friday, September 28, 2012 1:27 PM  
To: Giles, Michael (EEO)  
Cc: Vincent Mazaitis  
Subject: RE: VW Group - Friday Beetle Test Visit  
Mike,

The laboratory performs a review of the test and all preconditioning activities to ensure the test is valid before providing certification with any results. We will forward VW copies of the results, as soon as we receive a copy the results, or, are informed that a preliminary summary is available.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---09/28/2012 01:00:23 PM---Hello David, Just a follow up to my voice message - we heard already (from Vince) that full results

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 09/28/2012 01:00 PM  
Subject: RE: VW Group - Friday Beetle Test Visit

Hello David,

Just a follow up to my voice message - we heard already (from Vince) that full results will not be available for the Beetle TDI test until early next week due to extra measurement time for particulates.

However, if it is possible to obtain any form of early report for partial results such as emissions outcome relative to the standards, or fuel economy values, it would be greatly appreciated.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]

Sent: Thursday, September 27, 2012 2:07 PM

To: Giles, Michael (EEO)

Cc: Schlueter, Hannah (EASZ/1); Jim Snyder; Peter, Juergen (EASZ/1)

Subject: Re: VW Group - Friday Beetle Test Visit

Yes I will be in the office tomorrow morning at 7 am. If you cannot reach me when you arrive, you can also ask to see David VanAmburg. Let me know if you have any other questions.

Regards,

David A. Wright

U.S. EPA - OTAQ

Compliance Division, Light-Duty Vehicle Center

2565 Plymouth Road

Ann Arbor, Michigan 48105

734 214-4467

e-mail:wright.davida@epa.gov

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"Giles, Michael (EEO)" ---09/27/2012 08:54:38 AM---Hello David, I understand you are now our backup for Jim, who will be out beginning Friday.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>

To: DavidA Wright/AA/USEPA/US@EPA

Cc: "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>, "Schlueter, Hannah (EASZ/1)"

<hannah.schlueter@volkswagen.de>, Jim Snyder/AA/USEPA/US@EPA

Date: 09/27/2012 08:54 AM

Subject: VW Group - Friday Beetle Test Visit



Hello David,

I understand you are now our backup for Jim, who will be out beginning Friday.

Our colleagues are planning to be at your lab Friday for the start of testing for the Beetle TDI. Our normal lab visit contact person is Vince Mazaitis. We usually need to be there at 7:00 am to see the tests; are you available at this time in case Vince is still out?

Thanks,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, September 12, 2012 8:34 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder; William Ott; Chris Nevers  
Subject: RE: Request for US06 Drive Trace  
Mike,

Thank you for your response. I am wondering, if per our original request, if the factory has any 10 hz data, or if the only data available are 1 hz?

EPA may be requesting additional drive trace data from certification tests in the future and will be requesting the data in the format specified by SAEJ2951. Please do not hesitate to contact me if you require additional information or have further questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

"Giles, Michael (EEO)" ---09/05/2012 08:36:55 AM---Hello David, Please find attached the drive trace that the factory provided for this test.

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/05/2012 08:36 AM  
Subject: RE: Request for US06 Drive Trace

Hello David,

Please find attached the drive trace that the factory provided for this test.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Thursday, August 23, 2012 9:09 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Request for US06 Drive Trace  
Mike,

Thanks for your reply, I look forward to receiving the data once it has been provided by the factory. Please let me know if you have any other questions.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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\*\*\*\*\*

"Giles, Michael (EEO)" ---08/23/2012 08:05:42 AM---David, I have forwarded your request to our factory and will reply with the information as soon as i

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2012 08:05 AM  
Subject: RE: Request for US06 Drive Trace

David,

I have forwarded your request to our factory and will reply with the information as soon as it arrives.

Regards,  
Mike

From: DavidA Wright [mailto:Wright.DavidA@epamail.epa.gov]  
Sent: Wednesday, August 22, 2012 3:54 PM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: Request for US06 Drive Trace  
Michael,

EPA is requesting a 10 Hz US06 drive trace file for the following test number:

Mfr. Vehicle ID Test Date Manuf. Test Number  
Audi VW465 790007/09 12/09/11 CADX10019487

EPA is requesting the data be submitted according to the recommended practice SAEJ2951 Drive Quality Evaluation for Chassis Dynamometer Testing format.

If you have any questions regarding the format or SAEJ2951, please contact me.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov


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\*\*\*\*\* [attachment


"Copy of US06\_Trace.xlsm" deleted by DavidA Wright/AA/USEPA/US]

cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
		Test Number: 2012-0240-003			Vehicle ID: VW324 10220/13		
		Test Date: 9/28/2012			MFR Name: VOLKSWAGEN		
		Key Start: 09:59:06			MFR Codes: 590 VWX		
		Fuel Container ID: F00022			Config #: 00		
		Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur			Transmission: AUTO		
Test Procedure: 03 HWFET (hwfetprep_hwfet)			Shift Schedule: A09980011				
Calculation Method: Diesel			Beginning Odometer: 003994.0 MI				
Pretest Remarks:			Drive Schedule: hwfet_hwfet				
<b>Bag Data</b>							
	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	9.488 / 9.604	4.666	0.448	0.950	8.021		
Ambient	3.104	0.215	0.025	0.046	2.147		
Net Concentration	6.605 / 6.721	4.467	0.425	0.908	6.027	0.170	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
Remarks: <u>This test has particulate results.</u>							
<b>Results</b>							
	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	- / 0.046	0.062	0.009	196.9	0.048	0.001	51.889
(NMOG=NMHC)							
<b>Fuel Economy</b>							
	<u>Diesel MPG</u>	<u>Coastdown secs:</u>		<u>Dyno Settings</u>	<u>Dyno #:</u> D329 - FWD		
Phase 1	51.60		17.51		Inertia: 3625		
			17.43		EPA Set Co A: 8.93		
			17.31		EPA Set Co B: 0.1494		
					EPA Set Co C: 0.02109		
			17.41		Emiss-Bench: Mexa 7200die		
<div style="display: flex; justify-content: space-between; font-size: small;"> <span>v120518 - d329 EPAVDAEm120928093540</span> <span>Page 1 of 2</span> <span>Print Time 01-Oct-2012 14:40</span> </div>							

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0240-003				Vehicle ID: VW324 10220/13			
<b>Results</b>	<u>THC / IntTHC</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
	Phase 1 - / 0.470	0.631	0.089	2016.1	0.488	0.012	1.087
<b>Test Conditions</b>							
	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
Barometer (inHg)	29.23						
Avg Cell Temp (degF)	72.25						
Dew Point (degF)	48.41						
Specific Humidity (grains/lbm)	51.63						
NOx Corr Factor	0.9010						
CO2 Dilution Factor	14.078						
CFV Vmix (scf @68F)	4249.39						
Total Vmix (scf@68F)	4285.26						
CVS Flow Rate Avg (scfm)	333.24						
Fan Placement: One Fan - Up - Front							
Phase Time (secs)	765.10						
Distance (miles)	10.237						
Bag Analysis Time (secs)							
<b>MFR Test Results</b> for Procedure 3 HWFE							
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
1E+07	0.0428	0.01	0.002	196	0	0	
<u>Odometer</u>	<u>MPG</u>	PM		MFR Lab: Volkswagen AG, Dept EASZ/1			
3750 M	51.9	0.001		Dyno: 21			
MPG is 0.57 % higher than EPA MPG				Fuel: 19 Cert Diesel 7-15 ppm Sulfur			

v120518 - d329 EPAVDAEm120928093540
Page 2 of 2
Print Time 01-Oct-2012 14:40

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Information				Vehicle ID: VW324 10220/13				
	Test Date: 9/28/2012		MFR Name: VOLKSWAGEN					
	Key Start: 09:59:06		MFR Codes: 590		VWX			
	Fuel Container ID: F00022		Config #: 00					
	Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur		Transmission: AUTO					
	Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011					
	Calculation Method: Diesel		Beginning Odometer: 003994.0 MI					
Pretest Remarks:				Drive Schedule: hwfet_hwfet				
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<b>Phase 1</b>								
	B	445186	146.3467	146.3624	0.01570	3.752	0.367	
	C	445187	146.1236	146.1505	0.02691	6.428	0.628	
Remarks:					Exclude A			
<b>Phase 2</b>								
Remarks:								
<b>Phase 3</b>								
Remarks:								
<b>Phase 4</b>								
Remarks: This test has particulate results.								
Average Results					Net Wt mg	Total Mass mg	Total Mass mg / mi	
Phase 1					0.02131	5.090	0.497	
All filter weights are corrected for buoyancy.								
Reference Filter Stability Check				Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - FWD
2% of Avg Net or 0.01 mg		No.					PASS/FAIL	Inertia: 3625
0.01		1		144.67750	144.67818	0.00068	PASS	EPA Set Co A: 8.93
		2		143.30737	143.30775	0.00039	PASS	EPA Set Co B: 0.1494
								EPA Set Co C: 0.02109
Emissions Bench Mexa 7200dle								
v120518 - d329 EPAVDAEm120928093540				Page 1 of 2		Print Time 01-Oct-2012 14:40		

**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data


Test Number: 2012-0240-003

Vehicle ID: VW324 10220/13

<u>WEIGHING CHAMBER</u>	<u>Buoyancy</u>	<u>Operator</u>	<u>Chamber Temp</u>	<u>Dew Point</u>	<u>Barometer</u>	<u>Last Change in Status</u>
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b> 9/27/12 10:20	1.0011189	022298	72.9	49.5	29.28	NORM @ 09/27/12 00:11:40
<b>Post-test</b> 9/28/12 14:11	1.0011174	022298	71.8	49.3	29.18	NORM @ 09/27/12 21:49:31

<u>Test Conditions</u>	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.23			
Avg Cell Temp (degF)	72.25			
Dew Point (degF)	48.41			
Specific Humidity (grains/lbm)	51.63			
NOx Corr Factor	0.9010			
Dilution Factor	14.08			
CFV Vmix (scf @68F)	4249.39			
Sample Volume A (scf @68F)				
Sample Volume B (scf @68F)	17.929			
Sample Volume C (scf @68F)	17.941			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	11.957			
Total Vmix (scf @68F)	4285.26			
Phase Time (sec)	765.10			
Distance (miles)	10.237			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	43.9			
PSU Dil Air B (degC)	40.6			
PSU Dil Air C (degC)	38.5			
PSU Filter A (degC)	48.2			
PSU Filter B (degC)	45.7			
PSU Filter C (degC)	49.3			
PSU Dil Flow A (lpm)	0.0			
PSU Dil Flow B (lpm)	15.0			
PSU Dil Flow C (lpm)	14.8			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Information			Test Data				
			Test Number: 2012-0240-004 Test Date: 9/28/2012 Key Start / Hot Soak: 08:28:53 / 09:44 Fuel Container ID: F00022 Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur Test Procedure: 2 Calculation Method: Diesel Pretest Remarks:		Vehicle ID: VW324 10220/13 MFR Name: VOLKSWAGEN MFR Codes: 590 VWX Config #: 00 Transmission: AUTO Shift Schedule: A09980005 Beginning Odometer: 003983.0 MI Drive Schedule: ftp3bag Soak Period: 22.1 hours		
<b>Bag Data</b>							
		THC / IntTHC	CO	NOx	CO2	CH4	NonMeth HC
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>							
Sample		28.329 / 28.952	35.639	13.351	0.820	18.685	
Ambient		2.484	0.854	0.104	0.050	2.408	
Net Concentration		25.997 / 26.620	34.838	13.253	0.773	16.425	8.766
Remarks:							
<b>Phase 2</b>							
Sample		6.237 / 6.275	0.584	1.111	0.470	5.706	
Ambient		2.507	0.339	0.080	0.050	2.443	
Net Concentration		3.817 / 3.855	0.257	1.034	0.422	3.349	0.215
Remarks:							
<b>Phase 3</b>							
Sample		6.640 / 6.769	0.644	0.239	0.649	6.123	
Ambient		2.490	0.294	0.067	0.049	2.430	
Net Concentration		4.270 / 4.400	0.365	0.174	0.603	3.812	0.257
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: This test has particulate results.							
<b>Results</b>							
		THC / IntTHC	CO	NOx	CO2	CH4	NMHC / NMOG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		- / 0.348	0.919	0.530	320.2	0.248	0.114
Phase 2		- / 0.080	0.011	0.066	278.4	0.081	0.004
Phase 3		- / 0.057	0.010	0.007	248.3	0.057	0.003
Weighted		0.12933	0.19883	0.14598	278.619	0.10891	0.02699
							(NMOG=NMHC)
<b>Fuel Economy</b>							
		Diesel MPG	Dyno Settings				Dyno #: D329 - FWD
Phase 1		31.53					Inertia: 3625
Phase 2		36.51					EPA Set Co A: 8.93
Phase 3		40.95					EPA Set Co B: 0.1494
Weighted		36.38					EPA Set Co C: 0.02109
							Emiss-Bench: Mexa 7200dle



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0240-004

Vehicle ID: VW324 10220/13

### Results

	THC / IntTHC	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	- / 1.247	3.294	1.901	1148.1	0.890	0.410	1.087
Phase 2	- / 0.308	0.042	0.253	1070.5	0.310	0.017	
Phase 3	- / 0.205	0.034	0.025	890.4	0.205	0.012	


### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.22	29.22	29.22	
Avg Cell Temp (degF)	72.40	72.35	72.48	
Dew Point (degF)	51.08	51.21	51.46	
Specific Humidity (grains/lbm)	57.12	57.39	57.93	
NOx Corr Factor	0.9225	0.9236	0.9257	
CO2 Dilution Factor	16.222	28.461	20.609	
CFV Vmix (scf @68F)	2853.41	4871.63	2836.17	
Total Vmix (scf@68F)	2867.56	4895.11	2849.92	
CVS Flow Rate Avg (scfm)	336.62	335.63	335.77	
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	508.60	870.90	506.80	
Distance (miles)	3.586	3.844	3.586	
Bag Analysis Time (secs)	1004.5	248.6	135.8	

### MFR Test Results

for Procedure 2 CVS 75 and later (w/o can. load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0983	0.17	0.018	283	0	0.0038
Odometer	MPG	PM				
3739 M	35.9	0.001				
MPG is -1.31 % lower than EPA MPG						
MFR Lab: Volkswagen AG, Dept EASZ/1						
Dyno: 21						
Fuel: 19 Cert Diesel 7-15 ppm Sulfur						

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
		Test Number: 2012-0240-004		Vehicle ID: VW324 10220/13				
		Test Date: 9/28/2012		MFR Name: VOLKSWAGEN				
		Key Start: 08:28:53 / 09:44		MFR Codes: 590 VWX				
		Fuel Container ID: F00022		Config #: 00				
		Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur		Transmission: AUTO				
Test Procedure: 2		Shift Schedule: A09980005						
Calculation Method: Diesel		Beginning Odometer: 003983.0 MI						
Pretest Remarks:		Drive Schedule: ftp3bag						
		Soak Period: 22.1 hours						
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<b>Phase 1</b>								
	B	445180	146.3468	146.3592	0.01245	3.978	1.109	
	C	445183	145.2528	145.2600	0.00715	2.290	0.639	
Remarks:						Exclude A		
<b>Phase 2</b>								
	B	445181	144.9195	144.9251	0.00564	1.803	0.469	
	C	445184	143.5234	143.5348	0.01135	3.643	0.948	
Remarks:						Exclude A		
<b>Phase 3</b>								
	B	445182	141.4078	141.4182	0.01034	3.296	0.919	
	C	445185	144.3881	144.3946	0.00654	2.099	0.585	
Remarks:						Exclude A		
<b>Phase 4</b>								
Remarks: This test has particulate results.								
<b>Average Results</b>					Net Wt mg	Total Mass mg	Total Mass mg / mi	
Phase 1					0.00980	3.134	0.874	
Phase 2					0.00850	2.723	0.708	
Phase 3					0.00844	2.698	0.752	
All filter weights are corrected for buoyancy.								
Weighted All Filters:							0.75475	
<b>Reference Filter Stability Check</b>				Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - FWD
2% of Avg Net or 0.01 mg				No.			PASS/FAIL	Inertia: 3625
0.01				1	144.67750	144.67884	0.00134	PASS EPA Set Co A: 8.93
				2	143.30737	143.30760	0.00024	PASS EPA Set Co B: 0.1494
								EPA Set Co C: 0.02109
Emissions Bench Mexa 7200dle								
v120518 - d329 EPAVDAEm120928080610				Page 3 of 5		Print Time 01-Oct-2012 14:41		

**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0240-004

Vehicle ID: VW324 10220/13

<u>WEIGHING CHAMBER</u>	<u>Buoyancy</u>	<u>Operator</u>	<u>Chamber Temp</u>	<u>Dew Point</u>	<u>Barometer</u>	<u>Last Change in Status</u>	
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp	
<b>Pre-test</b>	9/27/12 10:20	1.0011189	022298	72.9	49.5	29.28	NORM @ 09/27/12 00:11:40
<b>Post-test</b>	9/28/12 10:18	1.0011205	022298	71.1	49.6	29.22	NORM @ 09/27/12 21:49:31

<b>Test Conditions</b>	<b>Phase 1</b>	<b>Phase 2</b>	<b>Phase 3</b>	<b>Phase 4</b>
Barometer (inHg)	29.22	29.22	29.22	
Avg Cell Temp (degF)	72.40	72.35	72.48	
Dew Point (degF)	51.08	51.21	51.46	
Specific Humidity (grains/lbm)	57.12	57.39	57.93	
NOx Corr Factor	0.9225	0.9236	0.9257	
Dilution Factor	16.22	28.46	20.61	
CFV Vmix (scf @68F)	2853.41	4871.63	2836.17	
Sample Volume A (scf @68F)	-3.769	-7.093	-4.082	
Sample Volume B (scf @68F)	8.979	15.327	8.942	
Sample Volume C (scf @68F)	8.947	15.249	8.886	
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	4.719	7.828	4.582	
Total Vmix (scf @68F)	2867.56	4895.11	2849.92	
Phase Time (sec)	508.60	870.90	506.80	
Distance (miles)	3.586	3.844	3.586	
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	35.6	34.2	37.8	
PSU Dil Air B (degC)	41.6	41.3	41.9	
PSU Dil Air C (degC)	39.1	38.1	39.5	
PSU Filter A (degC)	48.2	49.8	49.4	
PSU Filter B (degC)	50.9	53.6	49.8	
PSU Filter C (degC)	48.8	51.1	50.8	
PSU Dil Flow A (lpm)	15.0	15.0	15.0	
PSU Dil Flow B (lpm)	15.0	15.0	15.0	
PSU Dil Flow C (lpm)	15.0	15.0	15.1	
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

**To:** DavidA Wright/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; incent Mazaitis/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 10/2/2012 5:10:22 PM  
**Subject:** VW Group - Request for Release of Beetle

Hello David,

This note is in regards to the Beetle TDI vehicle (vehicle ID VW324 10220/13) which recently underwent confirmatory tests (FTP, Hwy) at EPA. We request release of the vehicle for evaluation and possible repair.

Prior to delivery to EPA, and due to a technical error, several gallons of gasoline (not diesel fuel) were added to the fuel tank, and the vehicle was subsequently driven. The mistake was recognized when the vehicle failed to re-start. After this incident, an attempt to correct the issue was made. At the time the vehicle was delivered, there was a brief discussion about this incident with Ben Haynes. To summarize, VW informed Ben of the incident and requested a discussion if there were problems during OBD checks prior to test.

Volkswagen is concerned that this mis-fueling incident may have caused damage to the test vehicle immediately prior to the test which, despite our attempts at recovery, could have negatively impacted the emissions results. We are therefore planning to evaluate the vehicle at our facility. If damage is found, we would like to repair the vehicle to the correct certification condition. Following this outcome, we would request that the vehicle be re-tested once repaired.

Please let us know if you have any concerns about the above steps.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/2/2012 5:33:55 PM  
**Subject:** Re: VW Group - Request for Release of Beetle

Hello Mike,

I've released the vehicle as Ben indicated.

I hope it's a minor "fix."

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: DavidA Wright/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, Jim Snyder/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 10/02/2012 01:10 PM  
Subject: VW Group - Request for Release of Beetle

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**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=David A Wright/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/2/2012 5:42:22 PM  
**Subject:** Re: VW Group - Request for Release of Beetle

I have no concerns with the steps you have described. I look forward to hearing what you learn once you have completed your diagnostics.

Regards,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

\*\*\*\*\*

This e-mail and any attachment contain information which is private and confidential and is intended for the addressee only. If you are not an addressee, you are not authorized to read, copy or use this e-mail or any attachment. If you have received this e-mail in error, please destroy it and notify the sender by return mail.

\*\*\*\*\*

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** David A Wright/AA/USEPA/US@EPA  
**Cc:** "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, Jim Snyder/AA/USEPA/US@EPA, "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 10/02/2012 01:10 PM  
**Subject:** VW Group - Request for Release of Beetle

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Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
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Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/4/2012 3:53:59 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Oct 1, 2012 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2013 FE Guide-all-rel dates-no-sales 10-1-2012.xlsx](#)

Richard,

Attached are the data in Verify as of Oct 1, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 3, 2012 for posting on the web. The next normal posting will be October 15, 2012.

Please make any needed corrections as soon as possible.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 10/10/2012 10:59:42 AM  
**Subject:** VW Group - Decision Info submitted V10 R8

Hello Jim,

We have recently submitted decision information datasets for 2 new (FEDV) configurations for Audi MY 2013 test group DAD XV05.2LR8:

Vehicle / configuration	Models	Type
DAV-558 / 0	R8 Spyder	FEDV
DAV-558 / 1	R8 Coupe	FEDV

These vehicles have a new 7 speed automatic transmission which will represent SOP for these models (the R8's are currently certified in this test group with a 6 speed transmission as the worst case vehicle).

We are also submitting a running change letter for the new transmission.

Note, there is no change for the existing worst case tests since they represent the Lamborghini models.

Please let me know if you have questions.

Michael Giles

Certification Specialist

Engineering and Environmental Office

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; avidA  
Wright/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 10/11/2012 5:28:15 PM  
**Subject:** RE: VW Group - Decision Info submitted V10 R8

Hello Jim / David,

A correction has been made for to both the running change and decision request for the R8 Spyder. The R8 Spyder with the new automatic 7 speed transmission will be the new worst case vehicle for this test group after all.

Vehicle / configuration	Models	Type
DAV-558 / 0	R8 Spyder	FEDV EDV
DAV-558 / 1	R8 Coupe	FEDV

From: Giles, Michael (EEO)  
Sent: Wednesday, October 10, 2012 7:00 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group - Decision Info submitted V10 R8

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We have recently submitted decision information datasets for 2 new (FEDV) configurations for Audi MY 2013 test group DAD XV05.2LR8:

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Michael Giles

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**To:** Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 10/15/2012 5:02:24 PM  
**Subject:** VW Group - HJetta Hybrid Release requested

Hello Jim, David and Vince,

Just to follow up on voice messages that Richard and I have left - We are requesting that the Jetta Hybrid be released.

We would like to try and pick it up this afternoon if possible. Please let us know the outcome at your earliest convenience.

Thanks,  
Mike

Michael Giles

Certification Specialist

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**To:** "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 10/15/2012 7:48:18 PM  
**Subject:** RE: VW Group - Jetta Hybrid Release requested  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Wright.DavidA@epamail.epa.gov](mailto:Wright.DavidA@epamail.epa.gov)  
[Mazaitis.Vincent@epamail.epa.gov](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)

Hello Brian,

I talked to Jim Snyder and he is in the process of releasing the Jetta Hybrid. As we discussed, please pick it up tomorrow.

Hello Juergen:

I will send you the connector from the vehicle tomorrow by Fedex. Please let me know if you need 24 hour delivery.

Regards,

Mike

From: Giles, Michael (EEO)  
Sent: Monday, October 15, 2012 1:03 PM  
To: Rhodes, Brian (EEO)  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com)  
Subject: FW: VW Group - HJetta Hybrid Release requested

Brian –

We will let you know when we get the ok.



From: Giles, Michael (EEO)  
Sent: Monday, October 15, 2012 1:02 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov); DavidA Wright (Wright.DavidA@epamail.epa.gov); Vincent Mazaitis (Mazaitis.Vincent@epamail.epa.gov)  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com)  
Subject: VW Group - HJetta Hybrid Release requested

Hello Jim, David and Vince,

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Mike

Michael Giles

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 10/16/2012 5:40:13 PM  
**Subject:** Beetle

Hi Jim,

Thanks for the feedback earlier about the Beetle. I passed along your comments that it might be possible to use another vehicle if need be.

I'll let you know what the plan is when it becomes known.

Thanks again,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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Auburn Hills, MI 48326

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**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];  
liver.schmidt@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/16/2012 8:38:05 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of Oct 15, 2012 which held up  
posting on www.fueleconomy.gov  
[VW Group 2013 FE Guide1-all-rel dates-no-sales 10-15-2012.xlsx](#)

Richard,

Attached are the data in Verify as of Oct 15, 2012. Labels with pea green fill in the first few columns were not sent to DOE on Oct 16, 2012 for posting on the web. The next normal posting will be November 1, 2012.

Please make any needed corrections as soon as possible.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 10/19/2012 11:43:06 AM  
**Subject:** FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates  
[Testinfo D3UG DAQ.pdf](#)  
[Vehicle Prep for EPA D3UG-DAQ.pdf](#)  
[carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
[www.audi.com](http://www.audi.com)  
[carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
[www.audi.com](http://www.audi.com)

Hi Jim,

As a follow up to your request yesterday, please advise if you need additional information for the stop/start instructions (please see the vehicle prep pdf file).

---

From: Stang, Carsten (N/EA-521)  
Sent: Friday, October 19, 2012 5:19 AM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO); Schuetze, Michael (N/EA-521)  
Subject: AW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Mike,

Please find attached the test information and vehicle preparation instructions that I prepared for the confirmatory testing of the D4 TDI:

The vehicle preparation instructions are more or less the same that we provided with the D4 4.0T in May. As we had no trouble back then these information should be sufficient this time, too.

Please call me in case you have any comments or ideas to improve the instructions.

Thanks and regards,  
Carsten

Mit freundlichen Grüßen  
Best regards

Carsten Stang  
Aggregatezulassung Neckarsulm  
Emission Certification

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N/EA-521  
D-74148 Neckarsulm  
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Mobil (BIK): +49-7132-31-742417  
[carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
[www.audi.com](http://www.audi.com)

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Registergericht/Court of Registry: Amtsgericht Ingolstadt

HRB Nr./Commercial Register No.: 1

Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Martin Winterkorn

Vorstand/Board of Management: Rupert Stadler (Vorsitzender/Chairman), Luca de Meo, Frank Dreves, Wolfgang Dürheimer, Bernd Martens, Thomas Sigi, Axel Strotbek

Wichtiger Hinweis: Die vorgenannten Angaben werden jeder E-Mail automatisch hinzugefügt und lassen keine Rückschlüsse auf den Rechtscharakter der E-Mail zu.

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---

Von: Giles, Michael (EEO)

Gesendet: Donnerstag, 18. Oktober 2012 22:31

An: Stang, Carsten (N/EA-521)

Cc: Rodgers, William (EEO)

Betreff: RE: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hi Carsten,

Just to pass along a request from EPA for the A8 testing - Our cert representative asked if you could provide (along with the usual instructions for testing) the following specific piece of information:

Explanation of operation of stop/start system (including pictures of the dash with examples of stop/start both on and off shown) so that it is clear to the driver how to use the system, and when it is active / inactive.

See you Monday!

Mike

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From: Stang, Carsten (N/EA-521)

Sent: Tuesday, September 25, 2012 8:21 AM

To: Rodgers, William (EEO); Thomas, Richard (EEO)

Cc: Giles, Michael (EEO); Freudenberger, Moritz (N/EA-631)

Subject: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Hello Bill, Hello Richard,

Please find attached the weights that we need to adjust the mass of the D4:

<< File: Gewichte\_D3UG-DAQ.pdf >>

Unfortunately it's German but it should be quite easy to understand J

Just in case you're interested in my flight schedule:

<< Message: WG: Reisebestätigung für: STANG /CARSTEN . Abreise 19 Oktober 2012,YZTR7Y >>

As we already talked about I'll be arriving on Saturday Oct 20th and Moritz Freudenberger and myself will check and prepare the car on Sunday Oct 21st.

You don't necessarily have to be there on Sunday, I think it should be enough to have access to the EEO office.

Do we need to fill out an access request again or is the old one still valid?

Anyway, can you please send me us access request for Moritz Freudenberger?

I think Moritz Freudenberger will leave on Wednesday or Thursday. I'll fly to LA on Saturday Oct 27th because we have an OBD-meeting on Oct 30th.

Regards,  
Carsten

Mit freundlichen Grüßen  
Best regards

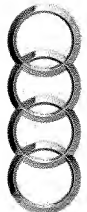
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carsten.stang@audi.de  
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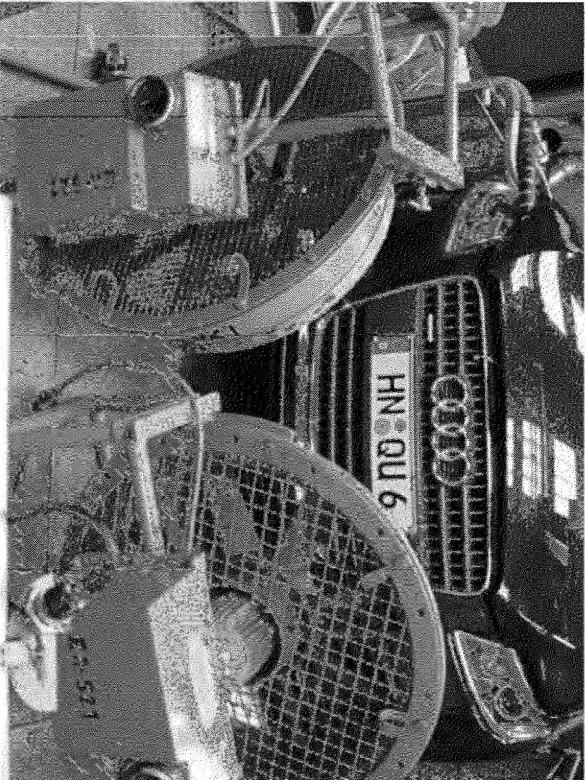
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# Test Information

Vehicle ID: D3UG-DAQ	Testversion 1
Equivalent Test Weight (lbs)	4750
Road Track Coefficients (lb f ; lb f/mph ; lb f/ mph^2)	39.791 / 0.36172 / 0.014957
Dyno Set Coefficients (lb f ; lb f/mph ; lb f/ mph^2)	-11.510 / 0.18809 / 0.013328
40 % Fuel Fill (gal)	9.5 (36l)
Design Curb Weight * (lbs)	4563
Front Axle (lbs) / Rear Axle (lbs)	2480 / 2083
Road Tire Pressure:	39 / 38
Front (psi) / Rear (psi)	
Precon. Evap.-Canister	Loading 2 Day
All Wheel Drive	

\* Weight adjustment: a total of 136 lbs (61 kg). 32 lbs in the passenger legroom positioned close to the bulkhead. 62 lbs on the left side of the rear legroom positioned close to the rear seat. 42 lbs on the right side of the rear legroom positioned close to the rear seat



# Vehicle ID: D3UG – DAQ

## Handling / Starting Instructions:

- If the engine is off the transmission locks in „P“ position. To unlock the transmission to move the car on the dyno you have to pull the lever on the driver side leg room. The lever can be secured with the small aluminum bar. If the car is well positioned on the dyno you have to push the lever back to the ground. Please ensure that the button is pushed back to the ground before starting the test.
- To avoid any warning messages the hood has to be closed. Therefore both hood locks have to be closed manually.
- The car is equipped with a keyless go system. Therefore the key has to be inside the car and has to be positioned close to the driver. Without applying the brake pedal push “Engine Start / Stop”-button once till ignition is on (see 26 of attached picture). To start the engine you have to apply the brake pedal and push the “Engine Start / Stop”-button a second time till the engine cranks. Thereafter release the button. Now with the engine running the transmission can be shifted by drawing back the gearshift lever. Be careful that the transmission is in „D“ position indicated by a „D“ on the instrument panel.

## Location of Fuel Tank Drain Hoses:

- In the passenger compartment (right and left rear leg room)

## Location of Fuel Filler Door Release:

- Simply push the fuel filler door (right side of the vehicle) on the rear center of the flap for release

## Traction Control:

- As the car will be tested as four wheel drive no action is necessary

## Fan Placement:


- 2 Fans central in front of the car as approved by administrator, for reference see Test information sheet.



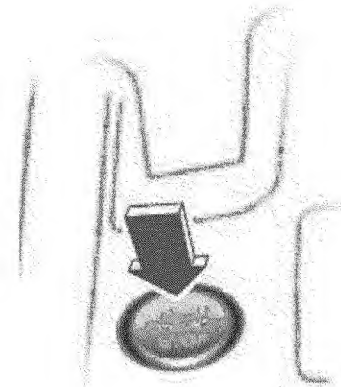
## Start/Stop System

- The car is equipped with a start/stop system that can be activated / deactivated by the driver. The system always uses the last mode of operation that was selected by the driver (last mode functionality). The system can be switched on / off by pressing the start-stop-button on the dashboard (see 19 of attached picture). A deactivated system is indicated by a LED integrated into the start-stop-button. Please ensure that the system is switched off before starting the test. Therefore the start-stop-button has to be illuminated.



19  **Start-Stop-System**

26 **Start Engine**



To: Jim Snyder/AA/USEPA/US@EPA;Chris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; hris Nevers/AA/USEPA/US@EPA;Joel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oel Ball/AA/USEPA/US@EPA;Joel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oel Dalton/AA/USEPA/US@EPA;Linc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; inc Wehrly/AA/USEPA/US@EPA;Roberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; oberts French/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; obert Peavyhouse/AA/USEPA/US@EPA;Tom Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; om Anderson/AA/USEPA/US@EPA;Michael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; ichael Olechiw/AA/USEPA/US@EPA;Alan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; lan Stout/AA/USEPA/US@EPA;Antonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; ntonio Fernandez/AA/USEPA/US@EPA;Glenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; lenn Passavant/AA/USEPA/US@EPA;Paul Machiele/AA/USEPA/US@EPA;Tad Wysor/AA/USEPA/US@EPA;"Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de];

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Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Johnson, Stuart (EEO)"  
[Stuart.Johnson@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Sat 10/20/2012 2:48:29 PM  
**Subject:** Volkswagen Group Meetings with USEPA  
[winmail.dat](#)  
[00\\_Draft\\_Agenda\\_EPA\\_Cert-Test.pdf](#)  
[00\\_Draft\\_Agenda\\_Tier3.pdf](#)

To all:

The Volkswagen Group has two meeting scheduled with EPA on Monday October 29, 2012.

At this time, I am writing to forward the attached copies of both agendas for your reference and planning.

1. The first meeting involves certification, test procedure, and labeling topics and our primary EPA contact is Jim Snyder. The meeting takes place from 1:00 - 3:00 p.m.
2. The second meeting addresses "Tier 3" topics, and our primary EPA contact is Michael Olechiw. The meeting takes place from 4:00 to 5:00 p.m.

We look forward to seeing you in Ann Arbor on the 29th.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

00\_Draft\_Agenda\_EPA\_Cert-Test.pdf  
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Phone: (248) 754-4204

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E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 10/22/2012 6:59:43 PM  
**Subject:** Diesel nozzle

Hi Jim,

I received your messages and we talked to Ben, who indicated that the filling issue should be resolved.

Please let me know if there are further issues.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; arsten.stang@audi.de[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/22/2012 7:37:20 PM  
**Subject:** Re: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates  
[carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
[www.audi.com](http://www.audi.com)  
[carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
[www.audi.com](http://www.audi.com)

I think we've figured it out. It has to do with fuel nozzle diameters.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Giles, Michael (EEO)" <michael.giles@vw.com>, [carsten.stang@audi.de](mailto:carsten.stang@audi.de)  
**Cc:** Ben Haynes/AA/USEPA/US@EPA  
**Date:** 10/22/2012 02:11 PM  
**Subject:** Re: FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

Mike, Carsten, the lab is having trouble fueling the vehicle due to a flapper door blocking the fuel nozzle. it doesn't seem to retract with our nozzle. Any trick to it? Please call me or if I'm not there, call Ben at 214-4261.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 10/19/2012 07:44 AM  
**Subject:** FW: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

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Thanks and regards,  
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Von: Giles, Michael (EEO)  
Gesendet: Donnerstag, 18. Oktober 2012 22:31  
An: Stang, Carsten (N/EA-521)  
Cc: Rodgers, William (EEO)  
Betreff: RE: EPA Confirmatory Testing D4 3.0 TDI CW43: weights + flight dates

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<< Message: WG: Reisebestätigung für: STANG /CARSTEN . Abreise 19 Oktober 2012,YZTR7Y >>

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Regards,  
Carsten

Mit freundlichen Grüßen  
Best regards

Carsten Stang  
Aggregatezulassung Neckarsulm  
Emission Certification

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[attachment "Testinfo D3UG\_DAQ.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Vehicle Prep for EPA  
D3UG-DAQ.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Verify Help Desk [verifyhelp@csc.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 10/23/2012 8:29:17 PM  
**Subject:** Please help with email problem - repeated test waiver notices.  
[image001.png](#)  
[here](#)

I was in my Audi inbox today (login Ex. 6) and noticed dozens (if not hundreds?) of repeated messages to notify of test waiver. There should have been only one message for each of 2 configurations.

The emails started on 10/18 and are still coming at a rate of a few per hour.

Here is text from one example:

- From: Verify Administrator
- Date: 10/21/2012 1:50:15 AM

Confirmatory Test for the following Vehicle has been Waived: Manufacturer: ADX Vehicle ID: DAV 558  
Vehicle Configuration: 0

Vehicle ID: DAV 558

Vehicle Configuration #: 0

Test Group Name: DAD XV05.2LR8

Transaction Identifier: \_e48ab268-7123-4026-acc7-def060e6ea67

Click [here](#) to view the status history.

Thank you for submitting your request to Verify via CDX.

Also here is a screen shot of my inbox when it started (and continues through today). I am sure it is still running. Please assist... Thank you in advance!

[IMAGE]

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



United States Environmental Protection Agency

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CDX



Logged in as Ex. 6 (log out)

Contact Us

Last Login: 10/23/2012 1:52:49 PM

## Central Data Exchange

MyCDX

Inbox (715)

My Profile

Submission History

1207 items found, displaying 221 to 240.

From

Subject

Received

Page 12 of 61

1

<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/19/2012 12:26:22 AM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/19/2012 12:15:50 AM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 11:25:34 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 11:14:34 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 10:23:13 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 10:13:15 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 9:11:28 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 9:10:13 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 8:10:35 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 8:09:01 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 7:09:49 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 7:08:15 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 6:09:12 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 6:07:36 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 5:08:35 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 5:06:56 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 1)	10/18/2012 4:08:00 PM
<input type="checkbox"/>	Verify Administrator	Submission accepted for your file upload CBI_8ADXY02_0366_APP_F06_R00.pdf	10/18/2012 4:06:54 PM
<input type="checkbox"/>	Verify Administrator	Confirmatory Test Waived (DAV 558 / 0)	10/18/2012 4:06:22 PM
<input type="checkbox"/>	Verify Administrator	Submission accepted for your file upload CBI_7ADXY02_0366_APP_F20_R00.pdf	10/18/2012 4:04:25 PM

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 6  
**Sent:** Tue 10/23/2012 9:49:59 PM  
**Subject:** Re: Please help with email problem - repeated test waiver notices. (HLP-3073)

Hello Mr. Giles,

Verify help desk ticket HLP-3073 was opened for your inquiry.

Please check your inbox to see if the "Confirmatory Test Waived (DAV 558/0)" notifications have stopped now. Also, will you please send the transaction id in the "Confirmatory Test Waived (DAV 558/1)" notification?

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael  
(EEO)"  
<michael.giles@vw.com> To  
Verify Help Desk@CSC  
cc  
10/23/2012 04:29 "Jim Snyder  
PM (Snyder.Jim@epamail.epa.gov)"  
<Snyder.Jim@epamail.epa.gov>  
Subject  
Please help with email problem -  
repeated test waiver notices.

I was in my Audi inbox today (login Ex. 6) and noticed dozens (if not hundreds?) of repeated messages to notify of test waiver. There should have been only one message for each of 2 configurations.

The emails started on 10/18 and are still coming at a rate of a few per hour.

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- Date: 10/21/2012 1:50:15 AM

Confirmatory Test for the following Vehicle has been Waived: Manufacturer:  
ADX Vehicle ID: DAV 558 Vehicle Configuration: 0

Vehicle ID: DAV 558

Vehicle Configuration #: 0

Test Group Name: DAD XV05.2LR8

Transaction Identifier: \_e48ab268-7123-4026-acc7-def060e6ea67

[Click here to view the status history.](#)

Thank you for submitting your request to Verify via CDX.

Also here is a screen shot of my inbox when it started (and continues through today). I am sure it is still running. Please assist... Thank you in advance!

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207





**To:** Verify Help Desk [verifyhelp@csc.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 10/24/2012 11:56:01 AM  
**Subject:** RE: Please help with email problem - repeated test waiver notices. (HLP-3073)

Thanks, the Config 0 emails have stopped.

Here is the ID for #1: Transaction Identifier: \_217021d8-e37f-4407-9caf-edf10d8ffcc

-----Original Message-----

**From:** [Ex. 6]@csc.com] On Behalf Of Verify Help Desk  
**Sent:** Tuesday, October 23, 2012 5:50 PM  
**To:** Giles, Michael (EEO)  
**Cc:** Snyder.Jim@epamail.epa.gov  
**Subject:** Re: Please help with email problem - repeated test waiver notices. (HLP-3073)

Hello Mr. Giles,

Verify help desk ticket HLP-3073 was opened for your inquiry.

Please check your inbox to see if the "Confirmatory Test Waived (DAV 558/0)" notifications have stopped now. Also, will you please send the transaction id in the "Confirmatory Test Waived (DAV 558/1)" notification?

Ex. 6

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Giles, Michael  
(EEO)"  
<michael.giles@vw To  
.com> Verify Help Desk@CSC  
cc  
10/23/2012 04:29 "Jim Snyder  
PM (Snyder.Jim@epamail.epa.gov)"  
<Snyder.Jim@epamail.epa.gov>  
Subject  
Please help with email problem -

repeated test waiver notices.

I was in my Audi inbox today (login Ex. 6) and noticed dozens (if not hundreds?) of repeated messages to notify of test waiver. There should have been only one message for each of 2 configurations.

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Vehicle Configuration #: 0

Test Group Name: DAD XV05.2LR8

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Thank you for submitting your request to Verify via CDX.

Also here is a screen shot of my inbox when it started (and continues through today). I am sure it is still running. Please assist... Thank you in advance!

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 10/25/2012 7:52:17 PM  
**Subject:** VW Group - Service manuals  
<https://erwin.vw.com/>

Hi Jim,

For access to VW Group service manuals, please visit our Erwin site: <https://erwin.vw.com/>

From there, go to the "My erwin" link in the upper right and register.

Then, send me back your user ID and I will forward it to the guy who can set up your account at no charge.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 10/26/2012 2:49:46 PM  
**Subject:** VW Vehicle delivery

Hi Jim, Hi Vince,

Just to confirm, we are planning to deliver the Audi A5 to your facility Monday morning. We should be there between 9 and 9:30 am.

Please pass the reminder along to Ben.

Thanks

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 10/26/2012 2:58:00 PM  
**Subject:** Re: VW Vehicle delivery

Thanks for the "heads up" Mike.

Have a great weekend!

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 10/26/2012 10:50 AM  
Subject: VW Vehicle delivery

Hi Jim, Hi Vince,

Just to confirm, we are planning to deliver the Audi A5 to your facility Monday morning. We should be there between 9 and 9:30 am.

Please pass the reminder along to Ben.

Thanks

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 10/26/2012 8:06:25 PM  
**Subject:** ULSD Labels  
[P1010002.JPG](#)  
[P1010001.JPG](#)

Hi Jim,

As we discussed, I am attaching photos of ULSD stickers which were present in the dash and fuel door of a MY 2012 Touareg in the lot (company issue production vehicle, not a test vehicle).

Regards

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

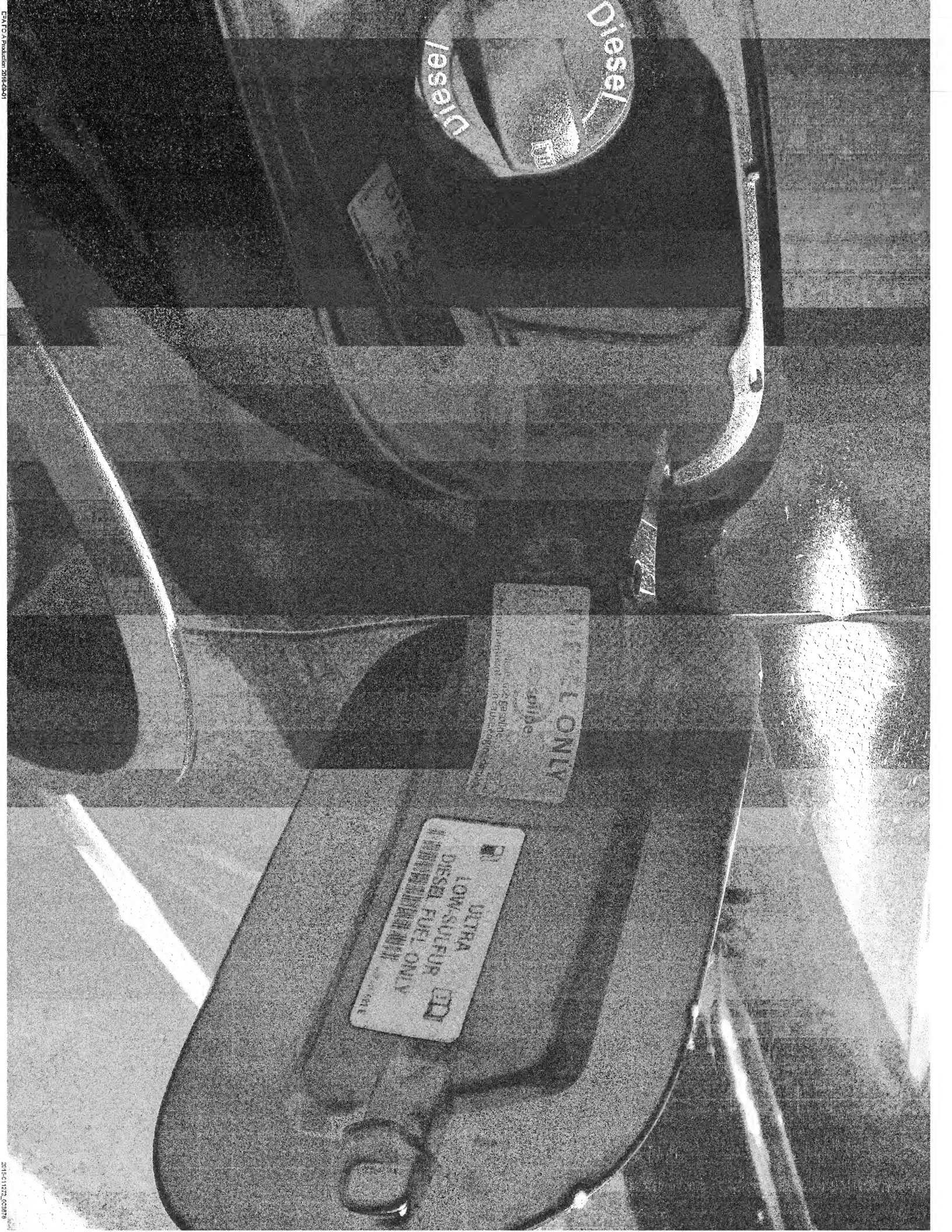
Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207





Diesel

Ultra

DIESEL ONLY

ULTRA  
LOW-SULFUR  
DIESEL FUEL ONLY





**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 10/29/2012 3:33:12 PM  
**Subject:** VW - A8 TDI

Hi Jim, Hi Vince,

Just following up on our A8 TDI, can you check latest status and let us know how the schedule looks?

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/29/2012 5:04:10 PM  
**Subject:** Re: VW - A8 TDI

Hello Mike,

I checked with the lab and everything for 329 is still on hold. We'll let you know when things start to move.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 10/29/2012 11:33 AM  
Subject: VW - A8 TDI

Hi Jim, Hi Vince,

Just following up on our A8 TDI, can you check latest status and let us know how the schedule looks?

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 10/29/2012 5:05:21 PM  
**Subject:** RE: VW - A8 TDI  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Thanks for the update Vince

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, October 29, 2012 1:04 PM  
To: Giles, Michael (EEO)  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: Re: VW - A8 TDI

Hello Mike,

I checked with the lab and everything for 329 is still on hold. We'll let you know when things start to move.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 10/29/2012 11:33 AM  
Subject: VW - A8 TDI

Hi Jim, Hi Vince,

Just following up on our A8 TDI, can you check latest status and let us know how the schedule looks?

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/29/2012 6:59:19 PM  
**Subject:** Re: VW - A5 Schedule

Hello Mike,

DFUB-BAQ is scheduled to roadload and prep tomorrow, 10/30/12, and test on 10/31/12. I would suggest to have Domenic and the other engineer here at 7:00 a.m. If there is a change, I'll let you know.

Ben noted there are some concerns with the vehicle. The tires on the vehicle are a different size than listed on the door jamb of the vehicle and in Verify. Please get with Jim Snyder or David Wright on that. Also there are no instructions on accessing the electronic oil level indication system, which is something we need to do.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 10/29/2012 01:51 PM  
Subject: VW - A5 Schedule

Hello Vince,

Just a small request related to the A5 test schedule: Domenic and one other engineer would like to witness the start of test. So, if you could keep us advised of the planned start time then they will plan to meet you then.

Thanks,

Mike



Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

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Auburn Hills, MI 48326

United States of America

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA;Ben Haynes/AA/USEPA/US@EPA[]; inent Mazaitis/AA/USEPA/US@EPA;Ben Haynes/AA/USEPA/US@EPA[]; en Haynes/AA/USEPA/US@EPA[]  
**Cc:** "Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 10/30/2012 1:27:27 PM  
**Subject:** RE: VW - A5 Schedule  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Hello All,

The supplemental dataset for the A5 has been changed to reflect the tire size 225/50 R17.

Please let me know ASAP if you have any other questions.

Thanks,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, October 29, 2012 5:08 PM  
To: Mazaitis.Vincent@epamail.epa.gov; Haynes.Ben@epamail.epa.gov  
Cc: Giles, Michael (EEO); Rist, Domenic (I/EA-523)  
Subject: Re: VW - A5 Schedule

Ben I talked to Domenic and he is looking into the tire issue. regardless of which tires, I want to confirm that we have the correct target ABCs before we do a road load. Mike, the supplemental's tire info needs to be corrected

Also, Domenic will bring a scan tool to look at the oil level tuesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 10/31/2012 2:22:36 PM  
**Subject:** Variable speed fan for FTP  
[Jenny.Sigelko@VW.com](mailto:Jenny.Sigelko@VW.com)

Hi Jim,

Can you give us any feedback about the use of variable speed fans for the FTP – is this currently acceptable? It sounds like we may want to do that for at least one vehicle in the future.

Thanks,

Mike

PS – please don't forget to register in the link I sent you, then send me your account name and we can get you free access to the service manuals.

From: Rodgers, William (EEO)  
Sent: Wednesday, October 31, 2012 10:12 AM  
To: Giles, Michael (EEO)  
Subject: FW: FTP test procedures

From: Sigelko, Jenny (EEO)  
Sent: Thursday, October 25, 2012 6:30 AM  
To: Rodgers, William (EEO)  
Cc: Braun, Marcus (N/EA-521); Stang, Carsten (N/EA-521)  
Subject: RE: FTP test procedures

I believe it is acceptable to use a variable fan if you keep the hood closed. I will have to check to make sure. The new 1066 is going to be very clear that this method is allowable, but I think EPA does allow it right now, keeping the hood closed. I'll confirm and reply again.

Thanks

Jenny Sigelko

Volkswagen Group of America

EEO-Auburn Hills MI

248 754 4214

Jenny.Sigelko@VW.com

From: Rodgers, William (EEO)  
Sent: Tuesday, October 23, 2012 1:31 PM  
To: Sigelko, Jenny (EEO)  
Cc: Braun, Marcus (N/EA-521); Stang, Carsten (N/EA-521)  
Subject: FTP test procedures

Hello Jenny,

The question was raised by Audi whether variable speed fans are allowed during the FTP cycle. We are locating for the current language which I'm pretty sure spells out a fixed fan volume. In the meantime, do you know if there has been any discussion about this for the new 1066 regulations.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; im Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 10/31/2012 9:57:13 PM  
**Subject:** 2.0L TDI Diesel Discussion

When: Wednesday, November 07, 2012 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).  
Where: Telephone Conference

Note: The GMT offset above does not reflect daylight saving time adjustments.

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

Hello all:

We would like to have a telephone conference with EPA to discuss the 2.0L TDI diesel that was recently tested at the EPA laboratory.

A local and toll-free dial in is provided below, as well as the passcode.

Please let me know if this date and time is acceptable.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com<mailto:leonard.kata@vw.com>

Join online meeting<<https://join.vw.com/leonard.kata/76929Z78>>  
<https://join.vw.com/leonard.kata/76929Z78>

Join by Phone

**Ex. 6**

Find a local number<<https://dialin.vw.com>>

Conference ID: **Ex. 6**

Forgot your dial-in PIN?<<https://dialin.vw.com>> | First online meeting?<<http://r.office.microsoft.com/r/rlidOC10?clid=1033&p1=4&p2=1041&pc=oc&ver=4&subver=0&bld=7185&bldver=0>>  
[!OC([1033])!]

.....

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Stang, Carsten (N/EA-521)" [Carsten.Stang@audi.de]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 11/2/2012 2:14:52 PM  
**Subject:** VW A8 Test

Hello Jim and Vince,

Just a couple things related to the A8 tests next week:

- Due to the fact that there is current drain when the vehicle sits with the key (the vehicle and the key "talk to each other") - could you arrange to have a charger connected to the vehicle battery over the weekend? This would be helpful to prevent any complications from a dead battery.

- Just a reminder - we are requesting the use of 2 small fans (FTP/HWY) and 2 large fans for US06, which is the same setup used for the other 3.0L TDI vehicles (Q7 and Touareg). The details are provided in the supplemental information, please advise if there are any concerns.

I plan to confirm the test schedule with you Monday. If all goes as planned I will also be there to see the start of test Tuesday.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 11/2/2012 6:03:13 PM  
**Subject:** VW Group - Question about current measurement

Hi Jim,

Would you be able to tell us what kind of analyzer is used for current measurement for the hybrids? We want to confirm that it is similar to what we use to understand our correlation.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Mon 11/5/2012 12:06:33 PM  
**Subject:** 2.0L TDI Diesel Confernece Call

Hello Jim:

I understand that you had asked Mike Giles about the content of the telephone conference we wish to have at 10:00 a.m. on Wednesday, November 7, 2012. As you recall, we recently tested a 2.0L TDI Diesel vehicle at EPA. The vehicle exceeded the emission standard, and was removed from the laboratory for analysis. We wish to present our engineering analysis and discuss next steps. I expect the meeting to be more of a technical discussion, than one regarding policy.

I assume that the meeting time and date is acceptable. Please let me know if any changes are necessary. The dial-in information is in the invitation and shown below:

Join by Phone

Local: +1 (248) 754-6400, or

Toll free: +1 (855) 858-8080

Conference ID: Ex. 6

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA; Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 11/5/2012 5:54:13 PM  
**Subject:** VW Group Testing

Hi Jim and Vince,

Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning ? If so I will be there at 7:00 or let me know otherwise.

Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 11/5/2012 6:52:50 PM  
**Subject:** Re: VW Group Testing

Hello Mike,

Just a follow-up e-mail, we should have lab data for the A5 later this afternoon, and the A8 diesel test is on track to test tomorrow 11/6/12. Please be here by 7:00 a.m.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 11/05/2012 12:57 PM  
Subject: VW Group Testing

Hi Jim and Vince,

Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning ? If so I will be there at 7:00 or let me know otherwise.

Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 11/5/2012 7:56:03 PM  
**Subject:** RE: VW Group - Question about current measurement  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Thanks Jim, I believe this will answer the question from the factory.

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, November 05, 2012 2:46 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group - Question about current measurement

We use a Hioki 3193 power meter with a clamp on probe for vehicle measurement. For AC recharge energy, there is another Hioki upstream of the charging outlet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 11/02/2012 02:03 PM  
Subject: VW Group - Question about current measurement

Hi Jim,

Would you be able to tell us what kind of analyzer is used for current measurement for the hybrids? We want to confirm that it is similar to what we use to understand our correlation.



Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 11/5/2012 9:49:19 PM  
**Subject:** RE: VW Group Testing  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Vince.

Could you please copy Bill Rodgers on the lab reports Tuesday, since I did not get the reports yet and I will not have email access tomorrow at EPA.

Regards

Mike

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, November 05, 2012 1:53 PM  
To: Giles, Michael (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Rodgers, William (EEO)  
Subject: Re: VW Group Testing

Hello Mike,

Just a follow-up e-mail, we should have lab data for the A5 later this afternoon, and the A8 diesel test is on track to test tomorrow 11/6/12. Please be here by 7:00 a.m.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 11/05/2012 12:57 PM  
Subject: VW Group Testing

Hi Jim and Vince,

Could either of you confirm that the A8 TDI testing is still on as planned for tomorrow morning ? If so I will be there at 7:00 or let me know otherwise.

Lastly, when it's available, could you please send me PDF copies of your lab reports for the A5 testing performed last week.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/6/2012 1:28:50 PM  
**Subject:** Fw: DFUB-BAQ  
[\[Untitled\].pdf](#)

Gentlemen,

Please find enclosed the FTP Laboratory Test Results for the Subject vehicle. If you have any questions or concerns, please contact me.

Thank you,

Vince Mazaitis

----- Forwarded by Vincent Mazaitis/AA/USEPA/US on 11/06/2012 08:26 AM -----

**From:** "EZTech\_Printer" <EZTek@epa.gov>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 11/06/2012 08:24 AM  
**Subject:** DFUB-BAQ

**To:** "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/6/2012 2:12:02 PM  
**Subject:** Fw: DFUB-BAQ\_Evap  
[\[Untitled\].pdf](#)

Good morning again guys,

Enclosed is the (unofficial) lab copy of the Evap test. Efforts are being make to enter the data into Verify. Again, if you have any questions or concerns, please call me. (Sorry the data is upsidedown!)

Thanks,

Vince Mazaitis

----- Forwarded by Vincent Mazaitis/AA/USEPA/US on 11/06/2012 09:08 AM -----

**From:** "EZTech\_Printer" <EZTek@epa.gov>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 11/06/2012 09:03 AM  
**Subject:** DFUB-BAQ\_Evap

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Rhodes, Brian (EEO)"  
[Brian.Rhodes@vw.com]; Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com];  
Tremonti, Norm (EEO)" [Norm.Tremonti@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/7/2012 12:53:45 PM  
**Subject:** VW Group - Release requested for Audi A5

Hi Jim,

We would like to request release of the A5. Let us know when it is released and we will arrange to pick it up.

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 11/7/2012 2:49:13 PM  
**Subject:** Slides for Toady's Conference Call  
[NB\\_Engineering\\_Report.pdf.pdf](#)  
[OBD\\_Approval\\_DVWXV02.0U5N\\_E-12-090.pdf](#)  
[KI\\_FACTOR\\_Typo\\_Correction.pdf](#)

Hello Jim:

Attached is a presentation and background material for today's discussion of the 2.0L TDI.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com



Matthew Rodriguez  
Secretary for  
Environmental Protection

# Air Resources Board

Mary D. Nichols, Chairman  
9480 Telstar Avenue, Suite 4  
El Monte, California 91731 www.arb.ca.gov



Edmund G. Brown Jr.  
Governor

May 3, 2012

Reference No. E-12-090

Oliver Schmidt  
General Manager  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Post-It® Fax Note	7671	Date	5/3/12	# of pages	2
To	VW	From	CARB		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	248-759-4207	Fax #	926-575-7012		

SUBJECT: Approval of Volkswagen's (VW) On-Board Diagnostic II (OBD II) System for 2013 Model Year Test Group DVWXV02.0U5N

Dear Mr. Schmidt:

The Air Resources Board's (ARB) Engineering Studies Branch has received the OBD II system description submitted by VW for the 2013 model year test group listed above. Representations made in the application indicate that the system is compliant with the OBD II regulation with the exception of NOx adsorber efficiency monitoring and oxygen sensor offset monitoring. Therefore, ARB approves the 2013 model year system with two deficiencies. While not considered deficient, staff has concerns regarding NOx adsorber efficiency monitoring and high temperature disablement. Details regarding the NOx adsorber efficiency monitoring deficiency and high temperature disablement concern are noted below. Details of the remaining deficiency and concern are noted in a previous approval letter (Reference No. E-10-123).

## NOx Adsorber Efficiency Monitoring Deficiency

For the 2013 model year, NOx adsorber efficiency monitoring is required to detect malfunctions at 1.75 times the standard. In presentations to ARB, VW has shown endurance run data indicating false failure decisions for the monitor calibrated at 1.75 times the standard and thus, the monitor has been calibrated to detect failures at 2.25 times the standard. Therefore, NOx adsorber efficiency monitoring is considered to be deficient. In order to remove this deficiency, VW is required to demonstrate robust detection of NOx adsorber efficiency malfunctions at 1.75 times the standard.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

Printed on Recycled Paper



Mr. Schmidt  
May 3, 2012  
Page 2

### High Temperature Disablement Concern

VW's OBD II strategy includes use of the engine coolant temperature (ECT) sensor to disable intake/exhaust flap adaptation and monitoring at temperatures above the normal operating temperature. However, the temperature used for disablement (94.96°C) is below the temperature which would indicate an over temperature condition to a vehicle operator (e.g., in the red zone of the temperature gauge or when the hot lamp is illuminated, 124°C). Furthermore, VW has indicated that the regulating temperature of the thermostat is 87°C, leaving only an 8°C gap between the regulating temperature and disablement of adaption and monitoring. While VW properly monitors the ECT sensor to identify malfunctions of the sensor itself to falsely indicate a warmer than normal temperature, staff is concerned that a biased high ECT sensor and/or other conditions that may cause actual elevated coolant temperature could disable adaptation/monitoring without any indication to a driver or technician. In order to remove the concern, VW is required to modify the adaptation and diagnostics to avoid disablement at temperatures below the temperature which indicates an over temperature condition to the vehicle operator.

Should you have questions or comments regarding this letter, please have your staff contact Ex. 7

Sincerely,

**Ex. 7**

Ex. 7

Mobile Source Control Division

cc: Ex. 7  
Engineering Evaluation Section

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Tremonti, Norm (EEO)" [Norm.Tremonti@vw.com]; Tremonti, Norm (EEO)" [Norm.Tremonti@vw.com]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Wed 11/7/2012 4:54:09 PM  
**Subject:** Re: VW Group - Release requested for Audi A5

Hello Mike,

The "official" results are finally in Verify. You may pick up the vehicle at any time. The vehicle is in the West lot and the keys are with Security as usual.

Thanks for your patience Mike!

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA, "Rhodes, Brian (EEO)" <Brian.Rhodes@vw.com>, "Tremonti, Norm (EEO)" <Norm.Tremonti@vw.com>  
Date: 11/07/2012 07:54 AM  
Subject: VW Group - Release requested for Audi A5

Hi Jim,

We would like to request release of the A5. Let us know when it is released and we will arrange to pick it up.

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/7/2012 8:11:50 PM  
**Subject:** RE: Voice Mail from Vincent Mazaitis (Work) (28 seconds)  
[7342144864](#)  
[Learn More...](#)  
[7342144864](#)  
[\(734\) 214-4864](#)  
[Mazaitis.Vincent@epamail.epa.gov](mailto:Mazaitis.Vincent@epamail.epa.gov)

Hi Vince,

Thanks for the follow up. Despite earlier intentions, as of now we will not plan to go to EPA for the Thursday tests.

SO, please call either Bill or I if there are any issues. We will follow up from here as best we can, or drive there if needed.

Thanks

Mike

From: Microsoft Outlook On Behalf Of Vincent Mazaitis  
Sent: Wednesday, November 07, 2012 1:53 PM  
To: Giles, Michael (EEO)  
Subject: Voice Mail from Vincent Mazaitis (Work) (28 seconds)

Voice Mail Preview:

Hi mike guard it's Vincent so I just wanted to EPARE it's one 2:00 dish are just wanted to double check with you on whether you were going to be here tomorrow for the start of the test do not.

Call please give me a call back area code.

7342144864 justice awaited just started a really up on release on o'clock so or give me a call back if you would please thanks bye.

Created by Microsoft Speech Technology. [Learn More...](#)

You received a voice mail from Vincent Mazaitis at 7342144864

Caller-Id:  
7342144864

Work:  
(734) 214-4864

E-mail:  
Mazaitis.Vincent@epamail.epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 6/10/2011 11:13:39 AM  
**Subject:** RE: VW and Audi Vehicle releases  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Yes we will accept the results for the Audi TTRS.

Thanks,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, June 09, 2011 4:37 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov; Haynes.Ben@epamail.epa.gov  
Subject: Re: VW and Audi Vehicle releases

Bill, I assume this means Audi accepts the FE values? I signed off on the two vehicles but I don't know where the keys are and who will be here to contact friday. I think you are better off waiting to Monday when we are all here.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)>, "Giles, Michael" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
Date: 06/09/2011 03:19 PM  
Subject: Vehicle releases

Hello Jim,  
Please release the VW Passat and Audi TTRS test vehicles. We hope to pick them up on Friday (tomorrow) and/or Monday.  
The Verify results came in today for the TTRS.

Thanks,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

/ \_ \.  
(o\\_l\_/o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 6/10/2011 11:58:33 AM  
**Subject:** RE: Audi cert request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

The Audi TTRS (CADXV02.53UK, VID 3UK-AMQ) was one of those certificate requests denied. I resubmitted the Application with the new CSI.

The Cert. Request was resubmitted as non-conditional because we had just completed and passed the confirmatory tests.

The application and CSI will be updated with the new confirmatory test results at the update time as originally planned. Let me know if you need that done now instead.

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, June 09, 2011 6:30 PM  
To: Rodgers, William  
Subject: Audi cert request



Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 6/13/2011 1:04:07 PM  
**Subject:** FW: Audi cert request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

Did you need me to resubmit anything on this?

Bill

From: Rodgers, William  
Sent: Friday, June 10, 2011 7:59 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: Audi cert request

Jim,

The Audi TTRS (CADXV02.53UK, VID 3UK-AMQ) was one of those certificate requests denied. I resubmitted the Application with the new CSI.

The Cert. Request was resubmitted as non-conditional because we had just completed and passed the confirmatory tests.

The application and CSI will be updated with the new confirmatory test results at the update time as originally planned. Let me know if you need that done now instead.

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, June 09, 2011 6:30 PM  
To: Rodgers, William  
Subject: Audi cert request

Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Robert Hart" [Robert.Hart@vw.com]  
**Cc:** VerifyHelp@csc.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/13/2011 3:11:21 PM  
**Subject:** Split-Bag US06 PM Issue (HLP-1321)

Bob,

(Helpdesk: This is in response to help desk ticket HLP-1321)

The core issue is that LOD (the EPA "Laboratory Operations Division") did not have a way of measuring PM for a split bag US06 test. To get around this problem they ran 2 tests, a single bag US06 for certification (measured PM), and a split bag US06 test for the fuel economy "Litmus" calculation. This causes an additional problem, because there can only be 1 "official" test ran and/or entered into Verify.

LOD now has a way of measuring PM for a split bag US06 test, so this shouldn't be an issue in the future, so we do NOT need to modify or suspend any of the current business rules.

I have talked to the certification representatives, and they have agreed to the following short-term work around for this problem:

A "correction" of the split bag test will be submitted with all of the same test results, but we will transfer the PM results from the single bag test to it. We will add a test comment that describes how and why this test was modified, and reference this email. I will make the modification to the test XML file and have our helpdesk submit it as "LOD" so that we can use the LOD fuel properties already in Verify.

The split bag US06 test is Verify test number CVWX91000952, but I do not have the test number for the single bag test.

Please provide me with the test number of the single bag test that contains the PM results, so that I can proceed.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 6/14/2011 8:27:02 PM  
**Subject:** VW Group - New decision information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted four new Decision Information's to support a running change. This running change replaces the existing worst case vehicle in test group CADXJ02.03UA.

The new test vehicle is a VW Tiquan 2.0 TFSI 4-motion with automatic transmission. It replaces the same model carried over to 2012 from 2011 model year. This new model represents 100% of 2012 model year Tiquan production. As the result of most changes aimed at improving fuel economy, all configuration require Manufacturer retests due to high FE for the ETW.

The manual transmission tests are forthcoming but I do not have them yet.

We are on a tight schedule with SOP so your decision on the automatics is requested at your earliest convenience.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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(o\\_l\_/o)



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 6/15/2011 10:55:01 AM  
**Subject:** RE: Issue(s) update  
[winmail.dat](#)  
[message\\_body.rtf](#)

Hi Bob;

If you need test numbers for EPA lab tests and current 2012 model year problems I have regarding bag 1 data for highway EPA tests here is a current listing:

Audi model index #70, city test # 9ADX09010296 (there is bag 4 data entered); highway test #9ADX09010297 (there is bag 1 data entered). I need this one soon because Audi of America has moved up the port release date.

Lamborghini model index #65, highway test # 9ADX09010216 (there is bag 1 data entered)

Regarding another issue; I sent you an email with a problem with the correction to 2010 Lamborghini index #002 and the litmus check not being calculated because the US06 in 2010 was a one bag test and I believe the US06 for the litmus test must have two bags. Do you have a suggestion regarding these US06 two bags?

The third issue for the Volkswagen Group is the rejection of the 2010 CAFE, because we corrected an axle ratio on the Audi TTS model. I can correct the 2010 CAFE input, if I remember how.

If you need anything or have any questions, please let me know.

Thanks,

Richard 248 754-4213

From: Peavyhouse.Robert@epamail.epa.gov  
[mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Tuesday, June 14, 2011 4:50 PM  
To: Thomas, Richard (EEO)  
Subject: Issue(s) update

Richard,

The write of the fuel economy values back to the production database should happen tonight.

The initial attempt failed, but we figured out the issues, and it is scheduled to happen ASAP.

I am in the process of getting access to submit tests as LOD, so if we have an EPA test that has fuel economy in for Bag 1 FE, then I will be able to fix this type of problem myself. It will probably take a couple of days to get my LOD permission, but If you still have a couple of these types of issues, I will be able to fix them.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
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website: <http://www.epa.gov/nvfel/> <<http://www.epa.gov/nvfel/>>



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7] [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7] [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Thur 6/16/2011 11:56:26 AM  
**Subject:** VW Group - Lamborghini Flex Fuel Test Group CNLXV06.55LX

Hello Jim,

Please be advised, the Lamborghini FFV test group (CNLXV06.55LX), which was originally planned for late MY 2012, has been postponed to early MY 2013.

Regards,

[Ex. 7]

[Ex. 7]

[Ex. 7]

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

[Ex. 7]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Fri 6/17/2011 6:54:45 PM  
**Subject:** Bugatti

Jim,

Thank you very much for the attention with Bugatti today, it is greatly appreciated!

Best Regards,

Mike

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 6/24/2011 5:08:58 PM  
**Subject:** re: 2012 FE Guide data for web posting on July 15, 2011 - Please review & let EPA know after the Verify data is error free and ready for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VWgroup-2012 FE Guide-6-23-2011.zip](#)

Richard,

Attached are Excel Spreadsheets for each manufacturer which you are handling.

The spreadsheet(s) are encrypted & password protected---with the same password as for the May posting. If you didn't have any FE Label data in EPA's Verify data base for the May posting, I'll call you with the password---or you can call me at 734-214-4450 to get the password. You'll need WinZip 11 or later (or other similar software) to unzip the files. We have WinZip 14.0.

The spreadsheet(s) contain all the 2012 FE label data from EPA's Verify data base as of June 23, 2011. Please review the attached data for errors (including my comments in the first column) and make the appropriate corrections in Verify. Please double check any new FE Labels which you input into Verify (not listed in this spreadsheet) to make sure they are error free. Any corrections should be made directly in the EPA Verify database. [Do not correct the spreadsheet and send it back.] I am forwarding the schedule for the July, 2011 release and some "reminders" for your convenience.

The models highlighted in green fill (if any) contain errors and will not be sent to DOE for web posting unless the errors are corrected.

The last date to make changes for the web posting is July 5, 2011. EPA will review the data on July 6 and forward it to DOE on (or before) July 7 for posting on the web on July 15, 2011.

Here are two additional reminders:

1. Model Type Descriptor: The new "model type descriptor" field in Verify release 8 (field GL-78.2 in the FE Label module) should normally be blank. This field should only be used to identify otherwise identical basic engines & model types---e.g. use a "4-valve" descriptor to delineate between otherwise identical 2-valve and 4-valve engines. Please enter "FFV" in the field if the vehicles are flexible fueled vehicles and "FFV" is not contained in the carline name.

2. Engine Management System: An "Engine Management System" (field GL-75 in the FE Label module) is defined as an idle stop/start system in Advisory Circular 83A, paragraph IV. B. 2 B. (page 4) as follows:

"IV. Definitions

B. Transmission Class

2. EPA will also distinguish transmission classes based on the presence of the following parameters:

b. Engine Management System. Vehicles equipped with an engine management system (a

stop/start engine device such as Volkswagen's SNA system [in the early 1980s]) will be in separate transmission classes from those not equipped with an engine management system."

Please don't enter "Yes" for that field unless the vehicle is actually equipped with such a system.

Please let me know when you have made all corrections, entered any new labels into Verify and everything is "good to go."

Thanks

----- Forwarded by David Good/AA/USEPA/US on 06/24/2011 10:51 AM -----

From: David Good/AA/USEPA/US  
To: Auto Industry Fuel economy representatives  
Cc: Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Roberts French/AA/USEPA/US@EPA, Ching-Shih Yang/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA, Karen Danzeisen/AA/USEPA/US@EPA, Sandra Somoza/AA/USEPA/US@EPA, hopsonjl@ornl.gov, lij1@ornl.gov  
Date: 06/10/2011 09:34 AM  
Subject: 2012 FE Guide - Schedule for the July, 2011 web release

To manufacturers,

Here's the schedule for July, 2011 web update for the 2012 FE Guide.

Date	Action
June 21 (Tues)	EPA staff performs 2012 FE Guide query (separated by mfr, etc) for EPA review
June 22 (Wed)	EPA sends FE Guide data to manufacturers for review & corrections
June 22-July 5	Mfrs review & make corrections
July 5 (Tues)	Last day for mfr corrections and data entry
July 6 (Wed)	EPA staff performs 2012 FE Guide query for EPA review
July 7 (Th)	EPA sends final data to DOE
July 15 (Fri)	DOE publishes 2012 FE Guide data on web

Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors (which are not corrected in EPA's Verify data base by July 5, 2011) will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov). For example, FE Labels will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the July release, we will post FE Labels on the web which have a release date of July 15, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISC-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years (even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR

600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISC-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISC-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

If you have any questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 7/8/2011 1:14:27 PM  
**Subject:** re: 2012 FE Label data in EPA data base as of July 6, 2011 is attached for your review (including data sent to DOE for web posting)  
[VW-group-2012 FE Guide-7-6-2011.zip](#)

Richard,

The attached 2012 FE Label data for the manufacturer(s) which you are handling were forwarded to DOE on July 7, 2011 for posting on the web at [www.fueleconomy.gov](http://www.fueleconomy.gov). [Only releasable, non-confidential data were forwarded to DOE.] The attached spreadsheet(s) are encrypted & password protected using the same password which I gave you previously.

The attached spreadsheet(s) include all 2012 FE Label data in EPA's Verify data base as of July 6, 2011. Note that the attached spreadsheet(s) also include data which were not forwarded to DOE because the data contains errors or the release date was after July 15, 2011.

Releasable data will be posted on the web on July 15, 2011. The models highlighted in green fill (if any) contain errors and were not sent to DOE for web posting. If the release date was prior to July 15, 2011 for these models, I'll be glad to send the corrected data to DOE for web posting after the errors have been corrected in Verify.

Please review the data and correct Verify if any errors still exist. Please contact me if you find any errors in the releasable data which was sent to DOE for web posting.

As we discussed yesterday, please let me know when the changes to oil viscosity, etc have been made in Verify and I'll send the data to DOE for posting on the web.

Thanks

Reminders:

FE Labels with errors won't be posted on the web: FE Labels with errors will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov). For example, FE Labels will not be sent to DOE for posting on [www.fueleconomy.gov](http://www.fueleconomy.gov) if they contain errors in the unadjusted combined fuel economy value; errors in the adjusted city, highway or combined fuel economy value; missing interior volume/cargo volume information (required for passenger cars only--except not required for 2-seater vehicles); duplicate entries, incorrect oil viscosity values, etc.

Release date for 2011 Labels: Please be sure that the release date is correct in EPA's Verify data base. For the July release, we will post FE Labels on the web which have a release date of July 15, 2011 and earlier.

2WD SUV Classification: As outlined on page 6 of EPA guidance letter CISD-10-14, Aug 5, 2010, when labeling 2WD SUVs, please continue to use the same vehicle classification category as in past model years

(even though 2WD SUVs equal to or less than 6000 lbs GVWR will be included in 2011 and 2012 passenger car CAFEs). Similar to EPA policy for 2011 model year vehicles, EPA will require 2012 and later model year 2WD SUVs to continue to be included in the 2WD SUV comparable class for fuel economy labeling purposes, based on the provisions of 40 CFR 600.315-08(a)(1) and 600.315-08(a)(2) as revised in 74 FR 61537, November 25, 2009.

Fuel Costs: New 2012 fuel costs will be provided to manufacturers in a future EPA guidance letter. Until the 2012 model year fuel costs are provided, manufacturers should continue to use the 2011 model year fuel costs provided in EPA guidance letter CISC-10-14. Please contact Bob Peavyhouse (734-214-4814 or by email) or me if you need a fuel cost for LPG or Hydrogen.

Range of comparable vehicles: Until the 2012 ranges (for the various classes of vehicles) are provided in a future EPA guidance letter, manufacturers should continue to use the 2011 model year ranges provided in CISC-10-19, Sept 13, 2010 (except if a model exceeds the 2011 range values, the manufacturer should extend the range appropriately); ref 40 CFR 600.306-08(b)(1).

Model Type Descriptor: The new "model type descriptor" field in Verify release 8 (field GL-78.2 in the FE Label module) should only be used to identify otherwise identical basic engines & model types---e.g. enter "4-valve" in the field to delineate between otherwise identical 2-valve and 4-valve engines; enter "FFV" in the field if "FFV" is not contained in the carline name, etc. Note that in some cases, Verify business rules will not allow the field to be blank. Thus, except to identify otherwise identical basic engines & model types, please enter "N/A" (not applicable) or the carline name in the field until the business rule can be revised.

Engine Management System: An "Engine Management System" (field GL-75 in the FE Label module) is defined as an idle stop/start system in Advisory Circular 83A, paragraph IV. B. 2 B. (page 4) as follows:

"IV. Definitions

B. Transmission Class

2. EPA will also distinguish transmission classes based on the presence of the following parameters:

b. Engine Management System. Vehicles equipped with an engine management system (a stop/start engine device such as Volkswagen's SNA system [in the early 1980s]) will be in separate transmission classes from those not equipped with an engine management system."

Please enter "Yes" for that field only if the vehicle is actually equipped with such a (stop/start) system.

Questions: If you have any additional questions, feel free to give your team member or me a call or send us an email message. I'm at 734-214-4450.

Regards

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 7/19/2011 11:59:03 AM  
**Subject:** VW Group - Beetle Manual Trans Tests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Just a heads up for you. I submitted new tests and decision information for 2012 VW Beetle 2.5L models with manual transmission in the follow test groups. There is no new technology involved. You have already waived the automatic transmission versions. I will submit the running change letter and revised application yet this week.

Test groups:

CVWXV02.5U35 – Federal-only T2B5

CVWXV02.5259 – 50-State T2B3 / LEV2 SULEV

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 7/26/2011 11:51:43 AM  
**Subject:** VW Group - Running Change for CVWXV02.5U35  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the following running change 03\_11 to add a new FEDV to the test group, Beetle 2.5L Manual trans. I have also submitted the associated Application revision which also includes changes resulting from the previous running change 02\_11. All tests were waived for these running changes. No Certificate revision is required.

Running Change: CBI\_CVWXV02.5U35\_APP\_C03\_R00.PDF

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

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(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 7/26/2011 12:14:04 PM  
**Subject:** VW Group - Running Change for CVWXV02.5259  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

The following running change 02\_11 has been submitted to add a new FEDV, Beetle 2.5L with manual transmission, to this T2/Bin 3 test group. All confirmatory tests were waived. No Certificate revision is required.

Running Change: CBI\_CVWXV02.5259\_APP\_C02\_R00.PDF

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

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(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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(o\\_l\\_o)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 8/3/2011 3:28:13 PM  
**Subject:** VW Group - OBD Related Field Fix 2007-08 VR6 Engines  
[CBI 7VWXV03.2535 APPFF02 .PDF](#)  
[CBI 8VWXV03.2535 APPRC03 .PDF](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

The attached OBD related Field Fix letters have been uploaded to Verify for your review. Please let me know if you have any questions.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Mon 8/15/2011 2:20:26 PM  
**Subject:** VW Group Methane Deterioration Factors

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

Title 40 § 86.1823-08(m)(2)(ii) and (iii)

2) N<sub>2</sub>O and CH<sub>4</sub>. (i) For manufacturers complying with the emission standards for N<sub>2</sub>O and CH<sub>4</sub> specified in §86.1818–12(f)(1), deterioration factors for N<sub>2</sub>O and CH<sub>4</sub> shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N<sub>2</sub>O and CH<sub>4</sub> as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

(3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (l) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH<sub>3</sub>OH (methanol), HCHO (formaldehyde), C<sub>2</sub>H<sub>5</sub>OH (ethanol), and C<sub>2</sub>H<sub>4</sub>O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

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#### §86.1818–12(f)(2)

(f) Nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N<sub>2</sub>O and CH<sub>4</sub> standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.

(1) Standards applicable to each test group.

(i) Exhaust emissions of nitrous oxide (N<sub>2</sub>O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(ii) Exhaust emissions of methane (CH<sub>4</sub>) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(2) Including N<sub>2</sub>O and CH<sub>4</sub> in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N<sub>2</sub>O and CH<sub>4</sub> emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N<sub>2</sub>O and CH<sub>4</sub> full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N<sub>2</sub>O and CH<sub>4</sub> emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life

emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 8/17/2011 2:54:58 PM  
**Subject:** VW Group - Bentley Mulsanne Application

Hello Jim,

Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary.

We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Please let me know if you have any questions.

Regards,

Bill Rodgers

VWGoA



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Wed 8/17/2011 7:17:06 PM  
**Subject:** RE: VW Group Methane Deterioration Factors

Jim,

Thanks for your reply. The regulations do look quite clear cut. I was just looking for a sanity check in case I am missing something.

We can follow up briefly sometime later.

Thanks again,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, August 17, 2011 1:42 PM  
To: Giles, Michael  
Subject: Re: VW Group Methane Deterioration Factors

Mike, I don't know why they specify separate DFs. I've tried to find out but most of the people that might know are on vacation so its taking long to get an answer this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From:  
"Giles, Michael" <michael.giles@vw.com>

To:  
Jim Snyder/AA/USEPA/US@EPA

Date:  
08/15/2011 10:21 AM

Subject:

VW Group Methane Deterioration Factors

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

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Title 40 § 86.1823-08(m)(2)(ii) and (iii)

2) N<sub>2</sub>O and CH<sub>4</sub>. (i) For manufacturers complying with the emission standards for N<sub>2</sub>O and CH<sub>4</sub> specified in §86.1818-12(f)(1), deterioration factors for N<sub>2</sub>O and CH<sub>4</sub> shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N<sub>2</sub>O and CH<sub>4</sub> as allowed under §86.1818-12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822-01 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

(3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (l) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH<sub>3</sub>OH (methanol), HCHO (formaldehyde), C<sub>2</sub>H<sub>5</sub>OH (ethanol), and C<sub>2</sub>H<sub>4</sub>O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

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§86.1818–12(f)(2)

(f) Nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N<sub>2</sub>O and CH<sub>4</sub> standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.

(1) Standards applicable to each test group.

(i) Exhaust emissions of nitrous oxide (N<sub>2</sub>O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(ii) Exhaust emissions of methane (CH<sub>4</sub>) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(2) Including N<sub>2</sub>O and CH<sub>4</sub> in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N<sub>2</sub>O and CH<sub>4</sub> emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N<sub>2</sub>O and CH<sub>4</sub> full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N<sub>2</sub>O and CH<sub>4</sub> emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Wed 8/17/2011 8:41:29 PM  
**Subject:** RE: VW Group Methane Deterioration Factors

Jim,

Thanks for the follow up. At first glance this looks better (allowing single DF from FTP for methane).

We will follow up with you again in the near future on this, after some discussion with our team.

Best Regards,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, August 17, 2011 3:55 PM  
To: Giles, Michael  
Subject: Fw: VW Group Methane Deterioration Factors

Mike, I talked to Tom Anderson who has been more involved with the latest rulemaking . He confirmed what you understood but also added new clarification that is included in the recent HD GHG rule.

Jim Snyder  
Light-Duty Vehicle Group  
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(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 03:51 PM -----

From: Tom Anderson/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA

Date:

08/17/2011 03:48 PM

Subject:

Re: Fw: VW Group Methane Deterioration Factors

Jim,

First Part of the Question: - N2O DF for assigned N2O value of 0.10 g/mi.

Mike is correct, the manufacturer can use the N2O emission standard of .010 g/mi in the optional CREE calculation and they do not have to this value (they only have to apply the N2O & CH4 DF if they use an actual measured values). See the regulation reference below:

§ 600.113 - 12 Fuel economy and carbon-related exhaust emission calculations for FTP, HFET, US06, SC03 and cold temperature FTP tests.

600.113-12 (g), (2), (iv), (C)

(iv) For manufacturers complying with the fleet averaging option for N2O and CH4 as allowed under § 86.1818–12(f)(2) of this chapter, N2O and CH4 emission values for use in the calculation of carbon-related exhaust emissions in this section shall be the values determined according to paragraph (g)(2)(iv)(A), (B), or (C) of this section.

(iv) (C) For the 2012 through 2014 model years only, manufacturers may use an assigned value of 0.010 g/mi for N2O FTP and HFET test values. This value is not required to be adjusted by a deterioration factor.

Second Part of the Question - separate DF's which seem to be required for City/Highway tests?

Separate City and Hwy DF's are required in the current (initial GHG regulations) however, there is a change being made to this provision as part of the Heavy Duty GHG final rule (which has been signed but is not official until it is published in the federal register).

Here is the new language (which can be found in the unofficial version on the OTAQ website) for manufacturers using the optional CREE method of complying with the N2O and CH4 cap standards:

§ 86.1823-08 Durability demonstration procedures for exhaust emissions.

\* \* \* \* \*

(m) Durability demonstration procedures for vehicles subject to the greenhouse gas exhaust emission standards specified in §86.1818. ....

(m) (2) N2O and CH4. (i) For manufacturers complying with the FTP emission standards for N2O and CH4 specified in §86.1818–12(f)(1) or determined under §86.1818–12 (f)(3), FTP-based deterioration factors for N2O and CH4 shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N2O and CH4 as allowed under §86.1818–12(f)(2), deterioration factors based on FTP testing shall be determined and may be used to determine

full useful life emissions for the FTP and HFET tests. The manufacturer may at its option determine separate deterioration factors for the FTP and HFET test cycles, in which case each FTP test performed on the durability data vehicle selected under §86.1822 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOC or NMHC emissions according to the provisions of this section.

Tom

From:

Jim Snyder/AA/USEPA/US

To:

Tom Anderson/AA/USEPA/US@EPA

Date:

08/17/2011 02:46 PM

Subject:

Fw: VW Group Methane Deterioration Factors

Jim Snyder

Light-Duty Vehicle Group

Compliance and Innovative Strategies Division

United States Environmental Protection Agency

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----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 02:45 PM -----

From:

"Giles, Michael" <michael.giles@vw.com>

To:

Jim Snyder/AA/USEPA/US@EPA

Date:

08/15/2011 10:21 AM

Subject:

VW Group Methane Deterioration Factors

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks,  
Mike

Michael Giles  
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Engineering and Environmental Office  
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Title 40 § 86.1823-08(m)(2)(ii) and (iii)

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manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

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§86.1818-12(f)(2)

(f) Nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N<sub>2</sub>O and CH<sub>4</sub> standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.

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(ii) Exhaust emissions of methane (CH<sub>4</sub>) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

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**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** CN=Willem VandenBroek/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/18/2011 5:19:56 PM  
**Subject:** Re: VW Group - Bentley Mulsanne Application

Jim,

I found 42 instances between mid-2005 and the present where VW has submitted the forms for a family or group of families before the payment was received. I suspect that this is the case here as well. All payments we have received to date are already accounted for. If this is regarded as paid by VW, I need to know the date that the ACH payment was made and I'll do some more looking.

Bill

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, Willem VandenBroek/AA/USEPA/US@EPA  
**Date:** 08/18/2011 12:59 PM  
**Subject:** Re: VW Group - Bentley Mulsanne Application

Hi Bill, I have to Ex. 6 but I've been looking through the cert app. Looks okay so far except that the fee payment isn't in our database yet. I see by the form that it was submitted 8/10 so its probably not thru the system yet.

I'm off tomorrow but I'll leave a copy of the fee form with Bill in case they was a problem with the checking labeling .

Jim Snyder  
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Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>  
**Date:** 08/17/2011 10:56 AM  
**Subject:** VW Group - Bentley Mulsanne Application

Hello Jim,

Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary.

We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Please let me know if you have any questions.

Regards,  
Bill Rodgers  
VWGoA

**To:** Linc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**Cc:** [REDACTED] Ex. 7 [REDACTED]@vw.com]  
**From:** [REDACTED] Ex. 7 [REDACTED]  
**Sent:** Fri 8/19/2011 3:26:23 PM  
**Subject:** Volkswagen/Audi Visit

Hello Linc and Jim:

I am writing to inquire about the availability of EPA staff to meet with representatives from VW and Audi on Thursday, September 29, 2011.

We have some folks visiting the US for a number of meetings, and would like to use the opportunity to discuss some topics with EPA. Our proposal is to meet with EPA staff in the morning of the 29th to discuss Tier 3 topics. These arrangements are being made separately.

I am interested in setting up a meeting in the afternoon on the 29th to discuss PHEV fuel economy and labeling, and other certification/emission testing topics. We would like about 2 hours in the afternoon.

Please let me know if this fits your schedules. I would appreciate it if you could suggest/invite other EPA staff as appropriate.

Best regards,

Ex. 7

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Ex. 7

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Ex. 7

**Ex. 7**

E-Mail: **Ex. 7** @vw.com